

Dayton L. Sherrouse, AICP

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January 22, 2014

Mr. Don West
 Environmental Management Support, Inc.
 8601 Georgia Avenue, Suite 500
 Silver Springs, Maryland 20910

RE: EPA Hazardous Brownfield Cleanup Application
 Former Sibley Mill
 Augusta, Georgia

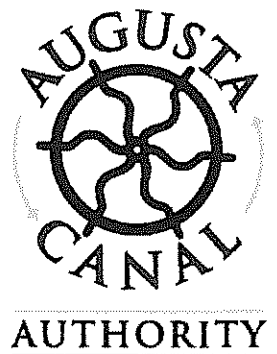
Dear Mr. West,

On behalf of the Augusta Canal Authority (ACA), I am pleased to submit the enclosed brownfield cleanup application for the former Sibley Mill located in Augusta, Georgia. The Augusta Canal Authority is a public body corporate and politic of the State of Georgia having been created by an Act of the General Assembly of Georgia in 1989 whose adopted mission is to "preserve, develop, and manage the Augusta Canal National Heritage Area as a public resource."

The Sibley Mill was constructed in 1881 on the banks of the Augusta Canal and operated continuously until it was forced to shut down in 2006 due to foreign competition. The surrounding Harrisburg community has been deeply impacted by the loss of this (and other) textile mills located along the Canal. The Sibley Mill has remained vacant since it closed, despite interest from local developers.

Since 2010, the ACA has been working with the Georgia Department of Natural Resources Environmental Protection Division (GA EPD) to assess and mitigate immediate source areas of contamination at the former Sibley Mill. The ACA was a successful applicant and recipient of a \$200,000 EPA Brownfields Cleanup Grant in 2013 to address some of the immediate concerns on one of the parcels that makes up the larger mill footprint. We are in the process of implementing cleanup on the first parcel with those grant funds, however much more work remains. As such, the ACA is requesting \$200,000 from the EPA to continue cleanup activities at another of Sibley Mill's parcels. The ACA is committed to providing the 20% cost share through cash payments.

Previous environmental assessment activities at the property revealed that significant contamination is present across the subject site (mainly in the form of impacted site soils from metals, VOCs, and SVOCs, asbestos, and lead-based paint), making it a potential health threat to nearby neighborhood residents and inhibiting the redevelopment of the property. It is, therefore, imperative that this property be remediated to minimize the potential health threats. In addition, specific redevelopment plans have been developed for the site, which will have a significant impact on the local economy through the creation of jobs and increased tax base. It is our hope that the EPA will assist ACA in completing the redevelopment of this property by funding this cleanup proposal.

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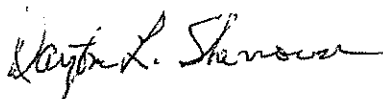
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Address

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 Post Office Box 2367
 Augusta, Georgia
 30903-2367

Thank you for your consideration of this grant application, we look forward to hearing from you soon. We are committed to the success of this project and the continued redevelopment of brownfield sites within our community. If you have any questions, please feel free to contact me at (706) 823-0440.

Sincerely yours,



Dayton Sherrouse, AICP
Executive Director

cc: Cindy Nolan, Region IV EPA

- a. **Applicant Identification:**
Augusta Canal Authority
Post Office Box 2367
Augusta, Georgia 30903
- b. **DUNS Number:** 626391135
- c. **Funding Requested:**
 - i): Grant Type: Cleanup
 - ii): Federal Funds Requested: \$200,000
 - iii): Contamination: \$115,000 Hazardous; \$85,000 Petroleum
- d. **Location:** Augusta, Richmond County, Georgia
- e. **Property Name:** Former Sibley Mill – 1717 Goodrich Street, Augusta, Georgia 30904
- f. **Contacts:**

i) Project Director	ii) Head of Organization/Chief
Executive:	
Dayton Sherrouse, Executive Director	Richard Isdell, Chairman of the Board
Augusta Canal Authority	Augusta Canal Authority
PO Box 2367	2605 Peach Orchard Road
Augusta, GA 30903	Augusta, GA 30906
Phone: (706) 823-0440 Ext. 1	Phone: (706) 798-1548
Fax: (706) 823-1045	Fax: (706) 798-1080
Email: sherrouse@augustacanal.com	Email: xiler8ng@bellsouth.net
- g. **Date Submitted:** January 22, 2014
- h. **Project Period:** October 1, 2014 – September 30, 2017
- i. **Population:** 134,324*
*American Community Survey 2012 5-year estimate data

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1. COMMUNITY NEED

a) *Targeted Community and Brownfields*

i. Targeted Community:

Originally constructed in 1845, the Augusta Canal is one of the most in-tact canal systems in the United States. With the original mission a triumvirate of transportation, water supply, and hydropower, it still exists as one of the best examples of a fully integrated industrial canal system, which led to its designation as a National Historic Landmark in 1978 and a National Heritage Area in 1996. The first industrial use of the canal occurred in 1847 with construction of a saw and grist mill. However, the first major industrial construction effort occurred during the Civil War when the Confederate States of America located their gunpowder factories here. Thirteen structures were built along the canal's banks for various war munitions activities, including the Confederate Powder Works (producer of the Confederate's gunpowder) on property that would later become the Sibley Textile Mill. Realizing the importance of Northern capital to economic recovery efforts after the South's loss of the Civil War, the City took efforts to attract Northern industry. The first steps included the widening of the canal, which was completed in 1875. Shortly after the canal was widened, multiple large-scale factories opened along its banks including an iron works facility and three massive textile mills, including Sibley Mill, which began manufacturing operations in February 1882. Enterprise Mill and Granite Mills were also constructed at this time. Interestingly, the Sibley Mill was constructed using bricks and other materials recycled from the former Confederate Powder Works (a precursor to our sustainable redevelopment efforts a century later). For nearly 125 years, Sibley Mill functioned as a full-scale textile operation – bales of cotton would enter the mill from one end – finished and dyed denim material would exit the other. The mill was powered by the hydroelectric turbines that utilized water from the Augusta Canal, turbines which are still in use today.

Similar to most Southern textile towns, a mill village was constructed at the same time as the mill to house workers in close proximity to the factory. The first thirty tenement houses were built prior to the mill's opening in what became the Harrisburg Mill Village, with more added over time. Eventually the neighborhood grew to be a hub of blue-collar workers, an ample labor source for the adjacent industries; labor that was completely dependent on the mills. From its inception, Harrisburg was a poor and uneducated working community. Over time, however, independent businesses opened in Harrisburg, along with several churches and an elementary school, causing the neighborhood to grow and flourish as a closely-knit community. Unfortunately, the mill village rapidly deteriorated when the mills were forced to close due to competition from foreign outsourcing. Locally owned shops and businesses were also forced to close, when the residents who supported them moved away in search of work. Harrisburg saw a significant decrease in population with the close of each textile mill, including Sibley in 2006.

ii. Demographic Information

The Harrisburg neighborhood has clearly been negatively impacted by the brownfields located in its midst. Enterprise/Granite Mill closed much earlier than Sibley Mill, but both closures impacted the community. As population dropped with the closing of the mills, crime and drug use increased, and many homes fell into disrepair. Recent statistics show that 24% of homes (with a median value of \$54,100) in Census Tract 2 are vacant, and only 31% are owner-occupied. Similarly, nearly 43% of homes (with a median value of \$51,500) in Census Tract 3 are vacant, and 43% are owner-occupied. (Census Tracts 2 and 3 together comprise the Harrisburg neighborhood.) Poverty and unemployment rates are much higher in these tracts than in the City of Augusta and State of Georgia. At its peak of operation, Sibley employed 466 operators. By the time the mill closed in 2006, the work force had dwindled to 125.

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Harrisburg Mill Village Demographics

	Harrisburg Neighborhood (Census Tract 2)	Harrisburg Neighborhood (Census Tract 3)	City of Augusta	State of Georgia	United States
Population	2,800	932	134,326	9,714,569	309,138,711
% Minority (Black)	64.8	48.2	60.6	30.6	12.6
% Women of Child Bearing Age	36.3	24.7	56.2	14.9	39.9
% Elderly	6.0	12.3	13.4	10.7	13.2
% Children	25.4	18.0	23.1	28.7	26.9
Per Capita Income	\$10,421	\$16,120	\$20,897	\$25,308	\$28,051
Median Household Income	\$16,133	\$24,423	\$34,864	\$49,604	\$53,046
Unemployment Rate	11.7	10.6	7.2		7.2
% Families with Children living in Poverty	45.4	44.9	36.6	19.7	17.2
% Poverty	51.2	30.6	26.7	17.4	14.9
Median Home Value	\$54,100	\$51,500	\$100,500	\$156,400	\$181,400
% Vacant Housing Unit	24	42.8	16.9	14.1	12.5
% Renter Occupied Homes	68.6	56.5	49.8	34	34.5
% Owner Occupied Homes	31.4	43.5	50.2	66	65.5

Source: US Census Bureau, 2013 American Community Survey 5-year Estimate Data, accessed January 2013.

iii. Brownfields:

For years, the Harrisburg Mill Village was impacted by the poor conditions of the moth-balled Enterprise, Granite and Sibley mills. Then, a forward thinking and sustainable-focused real-estate developer took an interest in the former mills. In 1998, the Enterprise buildings of the mill complex were purchased and subsequently redeveloped into a mixed-use residential and commercial space which earned Gold LEED certification. Following that successful redevelopment, the Granite mill portion of the complex was also purchased and redeveloped into a mixed-use space that earned a LEED certification. The same developer put plans in motion to continue these efforts at the Sibley Mill, and signed an option to purchase the site in 2007. As part of their due diligence, extensive environmental assessments were completed at the property, documenting impact to site soils from metals, volatile and semi-volatile organic compounds, asbestos, and lead based paint, along with multiple on-going source areas of contamination from over 100 years of heavy industrial use. Unfortunately, the economic recession took its toll, and the developer had to cancel the option to purchase and put his mixed-use redevelopment plans on hold.

The former Sibley Mill is currently vacant, idle, and stands as a significant impediment to efforts being undertaken by the Harrisburg neighborhood to revitalize itself. Located at 1717 Goodrich Street, the large mill complex consists of several buildings, totaling approximately 518,000 square feet, and several parcels, totaling 21.1 acres. The site includes the subject parcel for this application, the northern parcel consisting of 6.3 acres. A Confederate powder works was located on this site prior to the textile mill being constructed. The mothballed property is structurally intact, but clearly not ready for productive reuse due to extensive soil contamination by heavy metals, SVOCs, and VOCs that was documented in six distinct areas during multiple assessments at the site.

iv. Cumulative Environmental Impacts:

The presence of three former textile giants in the immediate neighborhood contributes significantly to a cumulative environmental impact assessment. The presence of the Department of Energy Savannah River site, the largest Superfund site east of the Mississippi River, just downriver from Augusta is another contributing factor. Other environmental hazards in the immediate vicinity include 118 regulated producers of air emissions (15 of which are considered major producers), 34 facilities with reported toxic releases, and 373 facilities with hazardous waste activities (including 11 large quantity generators).

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b) Impacts on Targeted Community

The former industrial giants – Granite and Enterprise Mill (9 acres), King Mill (25 acres), and Sibley Mill (21 acres) have (and continue to) impact the surrounding community. As previously stated, the once vibrant Harrisburg neighborhood has become a less than desirable place to live. As the industrial and manufacturing jobs left Augusta, so did the working class that populated Harrisburg. Homes became vacant, dilapidated, and havens for illicit activities and crime, as evidenced by the high localized crime rate in this neighborhood. Those who remain are a predominantly low-income, minority population. The former mill village homes were originally constructed to radiate out from the factories at the canal and their urban pattern encompasses several city blocks. Logically, the houses closest to the mill have the most potential for health risks from exposure. There are nine homes located along Kendrick Place that share a property boundary with the former Sibley Mill. The homes are literally across the fence from mill's former finishing facility, and a stone's throw from documented soil contaminated from lead and arsenic exceeding Georgia Type 1 Risk Reduction Standards (threshold values established for residential use). 50% of the women in the census tract that this block is part of are of child-bearing age, and are especially sensitive to lead (which causes low birth-weight babies and birth defects to developing fetuses). Further, more than 20% of the population in this census tract are children under the age of eighteen, who are also especially sensitive to lead (which causes learning disabilities to growing children). And despite the fact that the mill is fenced, children and other trespassers continue to seek adventures or shelter in the abandoned mill. Funding from this EPA Brownfield Cleanup Grant will allow the Augusta Canal Authority (ACA), the entity responsible for oversight of the Augusta Canal, to address the following health, welfare, and environmental impacts:

Environmental and Health: Exposure to contaminants – Metals, VOCs, and SVOCs are documented to exist in excess of regulatory threshold screening values in site soils from nearly 100 years of heavy manufacturing and mishandling of waste. There is an elevated risk of exposure to these contaminants via the dermal, inhalation, and ingestion pathways for the children and other trespassers as well as residents living immediately behind the former finishing building.

Welfare Impacts: Harrisburg residents live in constant fear of the crime that plagues the neighborhood. In an October 2012 news segment that covered a Town Hall meeting organized by Harrisburg citizens, residents were quoted with statements like "you hear gunshots throughout the night," "it breaks my heart to hear senior citizens talk about they understand what an automatic weapon sounds like," "we're just sitting ducks," and "I want to be able to go outside of my house in the evening and sit on my porch without worrying about somebody coming by and shooting me." In the month of November 2013, 75% of the City's reported aggravated assault instances took place in the Harrisburg neighborhood. (Sources: www.richmondcountysheriffsoffice.com and www.spotcrime.com)

c) Financial Need

i. Economic Conditions

The environmental cleanup required to put Sibley Mill back into safe productive reuse is significant. While the ACA has been able to fund some of the remediation (including \$242,695 for immediate source area stabilization to meet the requirements to be a bona fide prospective purchaser), it simply does not have the funds to complete the cleanup in its entirety. Funds from this grant are needed to complete the next phase of site cleanup so that the property will be one step closer to redevelopment. The same developer who expressed interest (and had an option to purchase the property in 2007) has again expressed interest in redevelopment of the mill now that the market seems to be slowly recovering. However, the planned and much needed redevelopment cannot occur until more of the environmental problems are addressed.

To date, ACA has already expended \$242,695 to clean up the property – effectively draining nearly all financial resources available for remediation of the site. The remaining funds available to help restore this site are planned to be expended as a match to the EPA's funds afforded by this grant. The ACA receives no operating funds from the City of Augusta but instead relies solely on revenue from the sale of electricity

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from four hydroelectric stations operated by the ACA, fees from admissions to the ACA's Interpretive Center and Petersburg Boat Trips (water tours of the canal), revenue from the gift shop, and grants from the National Park Service to fund operations. We do receive some Special Purpose Local Option Sales Tax (SPLOST) funding that was voted on in a referendum for a specified period of time and for an enumerated list of projects. Our allotment for 2014 will pay for the cleanup grant match, but the ACA will not have sufficient funds to cover the entire remediation work.

ii. Economic Effects of Brownfields

The Harrisburg neighborhood (Census Tracts 2 and 3) has clearly been negatively impacted by the brownfields located in its midst. At its peak of operation, Sibley employed 466 operators. By the time the mill closed in 2006, the work force had dwindled to 125. Harrisburg, reeling from the financial impact, had degraded into the undesirable neighborhood found there today. The financial need of those living adjacent to the former Sibley Mill is significant. As the demographic table indicates, the median household income and the per capita income in Census Tract 2 is less than half that of the City, state, and country, while Census Tract 3 is only slightly better but still significantly below the City, state and country. Poverty and unemployment rates are much higher in these tracts than in the City of Augusta and State of Georgia. Furthermore, the elementary school serving students from the Harrisburg community has an 87% Black or African-American population, with 97% of students receiving free or reduced school lunches according to the Richmond County Public School System's records. In order to bring residents from this clearly impoverished community up to the same economic standards of the surrounding City, the mill property must be addressed.

2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

a) *Project Description*

i. Existing Conditions:

The former Sibley Mill is impacted by extensive soil contamination by heavy metals, SVOCs, and VOCs that was documented in six distinct areas during multiple assessments at the site. In 2009, after the developer who had performed extensive environmental assessment canceled his option to purchase Sibley Mill, the ACA realized that environmental cleanup of the former mill was necessary to protect both public health and the environment. Regardless of the economic conditions of the country, the property had to be secured and source areas of contamination stabilized so that public health to those living immediately adjacent to the mill would be protected and so that the property would be attractive to development when future financing became available. To that end, ACA began taking the necessary steps to acquire the property. Following a Phase I Environmental Site Assessment (ESA) performed in accordance with ASTM E1527-05 and All Appropriate Inquiries (AAI) requirements, the ACA submitted a Prospective Purchaser Corrective Action Plan (CAP) and an application for approval as a brownfield site to the GA EPD under the Georgia Hazardous Site Reuse and Redevelopment Act. On August 26, 2010, GA EPD approved the application and Corrective Action Plan and confirmed that the site met the Brownfields qualifying criteria established under the Act. The ACA subsequently purchased the property on August 31, 2010, and in September 2011, with approval to use City Special Purpose Local Option Tax (SPLOST) funds, began efforts to stabilize potential source areas of contamination. In keeping with the approved CAP, ACA removed and disposed of former caustic tanks and associated piping, dye tanks and associated piping, remediated mercury from the former boiler room, and remediated flooring in one building that had been contaminated with pesticides and herbicides. In 2013, in order to facilitate the cleanup and redevelopment of the site, the ACA subdivided the property into two parcels – the southern, canal-side parcel and the northern, river-side parcel (the subject of this application). In October 2013, ACA was awarded an EPA Brownfields Cleanup to address the southern parcel. Since the fall of 2012 and in keeping with the approved CAP, ACA has removed several smaller site buildings and tanks on the northern parcel, including the former blacksmith shop, the former pipe shed, multiple storage sheds, and the former water tanks. The

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6.33-acre northern parcel includes the No. 5 Building, No. 13 Building, No. 14 Building, the Boiler Room, Finishing Building, and some smaller structures. Soils in the area between the No. 5 Building and the former storage shed location are predominately contaminated with heavy metals (denoted as Area F in the CAP).

Sibley Mill is a prominent feature within the boundaries of the congressionally designated Augusta Canal National Heritage Area. The Canal Master Plan, the recently completed Master Plan prepared for the City and the City's comprehensive plan recommends preservation and redevelopment of these vacant historic sites, such as the Sibley Mill, within the City. We acquired this property and are undertaking the environmental remediation of the site as a first step toward its ultimate redevelopment. We will develop the property using the Department of the Interior Rehabilitation Standards for Historic Properties. These standards will be required of a private developer if/when the property is sold.

In an effort to address the blight in the neighborhood, the Harrisburg community came together with the help of the Georgia Conservancy's program "Blueprints for Successful Communities" to reinvent itself. Multiple visioning sessions and planning charrettes occurred in the neighborhood over the past several years, resulting in an overall plan for the community's redevelopment. Included are community gardens, green spaces, and linked trails to the canal. For Sibley Mill, the community envisions a mixed-use redevelopment similar to that of Enterprise and Granite.

We anticipate the site will be redeveloped for mixed use, incorporating the comments and proposals received from the general public at the community visioning process held on November 21, 2011. This visioning process followed up on the Georgia Conservancy's "Blueprints for Successful Communities" Program and was conducted to focus specifically on the community's redevelopment ideas for Sibley Mill.

One option under consideration is one similar to that proposed by the developer in 2007, which included a combination of mixed-use commercial/office/retail space. The developer planned two phases of redevelopment of Sibley Mill. The first phase included 224,275 ft² comprised of 64 one-bedroom and 140 two-bedroom condominiums (218,115 ft²) and office space of 6,160 ft² with a proposed budget of almost \$35.8 million. The planned second phase included 106,400 ft² of office/retail space; 75,800 ft² of residential space; and a 100,000 ft² parking deck without a confirmed budget. With the improving market, the developer sees the potential in Sibley Mill once again. A letter from Anne Catherine Murray, Vice President of Flywheel, formerly Augusta Capital, LLC, is included.

Located near Another option under consideration is the potential use by Georgia Regents University. The mill and neighborhood are ideally located to service the needs of university, students, and staff. GRU is currently completing a campus Master Plan and are considering Sibley Mill as a potential option for future space needs. A letter from Anthony Wagner, Chief Business Officer of GRU, is attached. However, until the onsite contamination at the Sibley Mill is addressed, neither of these visions for Sibley Mill and the Harrisburg community can become a reality.

ii. Proposed Cleanup Plan:

Since purchase of the site, we have secured the site, prepared an ABCA, completed the first phase of remediation, and began the second phase. In November of 2011, pursuant to the Corrective Action Plan approved by the GA EPD, we completed the following: removal and disposal of the caustic soda tanks and associated lines; removal and disposal of the dye tanks and associated lines; removal and disposal of the mercury in the boiler room from the gages and trenches; and, removal and disposal of the flooring in building #15 which was contaminated with pesticides and herbicides. In October of 2013, we began an EPA Brownfields Cleanup Grant for the southern parcel. Funds from this grant are being used to address six discrete areas of soil contamination.

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In preparation for this grant application, the ABCA was updated in December 2013 and presented to the Harrisburg community. The December 2013 ABCA outlined four options for remediation of impacted site soils, including the estimated costs. These options included no action, in place treatment, implementation of institutional and/or engineering controls, and complete excavation and disposal of impacted soil. Based upon comments received during the community meeting, the draft ABCA was revised to include a fifth option – a combination of engineering controls and excavation. The preferred cleanup approach is the combination of excavation and disposal of impacted soils and the implementation of an engineered cap. This method was selected based on its effectiveness, implementability and cost considering the anticipated limited extent of significant soil impacts at multiple locations within Area F and the limited budget to address the site. Additional institutional and/or engineering controls may be utilized to protect the public safety, if necessary.

Specifically, approximately 1,100 cubic yards of contaminated soils will be removed from the areas with the highest impacts. In addition, the remaining 1.2 acres of contaminated soils will require the installation of a two foot clean low permeability soil cap. The estimated cost for soil excavation and the placement of an appropriate cap is \$181,000. Since soil contamination has been documented by the Phase II ESA to exist under some of the buildings on site, we anticipate an environmental covenant for these areas for which the buildings are serving as a cap. The Georgia Brownfields Program does not require non-responsible parties to address groundwater, but it is likely that the environmental covenant put on the property will address groundwater also, because the groundwater does contain contaminants that are above State standards.

b) Task Description and Budget Table:

ACA plans to complete the following specific tasks with the proposed budget:

Task 1 – Community Outreach: We have budgeted \$12,000 of the requested funding for contractual expenses related to community outreach, education, and involvement activities. The selected consultant will present at regular community meetings with the various Harrisburg neighborhood associations and groups. The consultant will assist ACA with issuing public notices and newspaper articles to keep the local community informed of environmental cleanup activities and results. And, the consultant will support our Brownfields Task Force. For our existing Brownfields Cleanup Grant, we formed a Brownfields Task Force, comprised of active volunteers dedicated to the revitalization of the Harrisburg community and this historic mill village (as detailed Section 3.c of this proposal). The task force will also support the cleanup activities for this parcel.

Based on research and discussions with brownfield environmental consultants and the City of Augusta's Brownfields staff (the City has a long, successful program), costs associated with community involvement activities planned for the project include:

- Public Involvement Plan – that will outline outreach activities over the life of the grant (\$2,250)
- Brownfields Task Force meetings – meetings will occur quarterly (\$4,000)
- Press Events and Public Meetings – facilitate 4 – 6 meetings to disseminate project activities, environmental cleanup results and CAP requirements (\$2,000)
- Update and maintenance of Project Website (\$1,500)
- Preparation, Printing, and Distribution of Project Brochure and Fact Sheet (\$1,500)
- Public Notices and Comment Periods (\$750)

In addition to the contractual costs outlined above, ACA is requesting funds for travel (\$4,000) and supply (\$2,000) expenses under this grant application. Travel funds will allow ACA staff to attend regional and national EPA Brownfield conferences as well as other relevant workshops and training associated with sustainable redevelopment of brownfield properties. Supply funds will allow ACA to purchase supplies needed to support community outreach, such as printing brochures, conceptual renderings, and maps.

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Task 2 – Cleanup Planning: Cleanup planning will include finalizing the ABCA document, preparing the Quality Assurance Project Plan(s) for confirmation soil sampling, and negotiating and receiving the necessary regulatory approvals. Cleanup planning costs are anticipated to be \$22,500 and include the following:

- Finalization of ABCA document, including incorporation of comments from public notice and regulatory review (\$2,500).
- Engineered cap design and implementation plan (\$7,500)
- Revisions of the CAP to reflect final Work Plan (\$3,500)
- Preparation of a Quality Assurance Project Plan, Confirmation Sampling Plan, and Health and Safety Plan (\$5,000).
- Development of bid documents for site cleanup activities, evaluation of bids, and selection of contractor (\$4,000).

Task 3 –Site Cleanup: We will use the majority of the grant funds for the actual site cleanup activities. Based on the Phase II ESAs of the property and the findings from the draft ABCA, we plan the following remedial activities:

- An engineered cap will be placed over an approximately 1.2-acre area. The estimated cost for site preparation, transport, placement, and compaction of clean material for the cap is estimated at \$50,000/acre, including a contingency of 20%. Based on the estimated area of contamination in Area F of 1.2 acres, the estimated total cost for this work is \$60,000.
- Removal, transport, and disposal of 1,100 yd³ of contaminated soils and subsequent backfilling of the excavation area with proper compaction and restoration. The cost of this task is estimated to be \$121,000.
- Collect and analyze 22 samples for waste characterization and confirmation sampling. The waste characterization samples will be analyzed for the Toxic Characteristic Leaching Procedure for metals, SVOCs, and VOCs. The confirmation samples will be analyzed for total TAL metals, SVOCs, and VOCs. (\$18,500)

In summary, the total cost of project activities is estimated to be \$240,000. Therefore, we will provide the cost share of \$40,000 to the EPA's \$200,000 in grant funds through cash payments from our SPLOST allotted funding. Personnel time to administer the grant will be in-kind, leveraged work.

Sibley Mill Cleanup Proposed Budget

Budget Categories (programmatic costs only)	Project Tasks			
	Task 1 Community Outreach	Task 2 Cleanup Planning	Task 3 Site Cleanup Activities	Total
Personnel				
Fringe Benefits				
Travel	\$4,000			\$4,000
Equipment				
Supplies	\$2,000			\$2,000
Contractual	\$12,000	\$22,500	\$199,500	\$234,000
Other (specify)				
Total	\$18,000	\$22,500	\$199,500	\$240,000
EPA Share	\$12,500	\$10,000	\$177,500	\$200,000
ACA Share	\$0	\$0	\$40,000	\$40,000

c) Ability to Leverage:

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The ACA is financially committed to the redevelopment of the former Sibley Mill and has expended \$112,666 to assess and then \$242,695 to stabilize potential source areas of contamination following acquisition of the property. The ACA utilized available funds (as authorized by the City of Augusta) from the SPLOST to complete much of the work.

Initial costs for the redevelopment of one portion of the former Sibley Mill were estimated to exceed \$30 million. By completing a majority of the environmental remediation activities, the ACA is positioning the mill to be a viable project for the developer Flywheel (see enclosed leveraging letter from Anne Catherine Murray, Vice President, Flywheel, formerly Augusta Capital, LLC), or other private developers for a redevelopment similar to those completed at the Enterprise and Granite mill complex.

3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

a. Community Involvement:

The Sibley Mill is located within the Harrisburg community, a unique neighborhood in the midst of a grass-roots campaign to turn back the clock and restore the neighborhood to what it once was. Several community-based associations are very active within this small community, including the Harrisburg-West End Neighborhood Association, the Historic Harrisburg Community Network, and the Historic Harrisburg Community Council. These groups, and others, have a vested interest in the improvement of their neighborhood. All are working together to clean up this historic mill village by improving structures, removing environmental contaminants, and banding together to stop crime. These associations are excited about the cleanup project that is just beginning at the adjacent parcel with the 2013 award of the first cleanup grant and look toward achieving this collective goal. The task force members have begun to serve as liaisons between the project and their respective organizations to disseminate and discuss information and collect input from the community. They will continue to serve in this role throughout the project's entirety. They will also serve as a resource to educate the community at large about brownfields as well as ensure the equitable redevelopment of the mill and surrounding mill village by representing the community's interests in the redevelopment planning.

As such, the project team will utilize the Brownfields Task Force as the primary method to both communicate information and guide project decisions. As we have scheduled for the 2013 EPA cleanup grant, the task force meetings will occur quarterly. Special called meetings will occur when a major project milestone is met or if specific questions need to be addressed. The Project Team will also prepare and distribute a project brochure, fact sheets about the environmental cleanup, and press releases/public notices in the local paper. Further, the Project Team will utilize the project website to be created as part of the 2013 grant – and will update this site throughout the project's entirety for 'real time' updates on the project and to house documents in an electronic repository. We will also maintain the information repository in the ACA's offices located in the redeveloped Enterprise mill and at the nearby Augusta Library located at 823 Telfair Street. Social media will continue to be utilized with regular updates to the Augusta Canal National Heritage Area Project Facebook page.

A public notice was printed in the local newspaper, *The Augusta Chronicle*, on December 15 and 16, 2013, announcing the ACA's intention to submit this EPA Brownfield Cleanup Application and the availability of the draft ABCA application. The notice invited community members to attend a public meeting on December 17, 2013, at the Salvation Army Kroc Center within the Harrisburg neighborhood. At the December 17th meeting, individuals associated with the cleanup were present and the proposed cleanup method discussed. A list of questions/comments and the responses are included with the Threshold Criteria. Attendees were reminded how to become and stay involved in the project. The public notice (along with the meeting sign-in sheet) is included with the Threshold Criteria. Based on comments received during the public meeting, the ABCA was revised to include a combination of two of the alternatives presented.

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Given the demographics of the area, and a very low Hispanic population, it is not anticipated that a Spanish speaker will be needed at public meetings. However, we will provide a translator should the need arise. Assistance will also be made available to those persons with physical disabilities who would otherwise be prohibited by their disabilities from participating in project-related meetings (such as holding meetings at locations that are handicap accessible). We will also work closely with its community-based partners, collaborative partners, and other contacts to ensure that communication messages reach all constituent groups.

During the actual environmental cleanup, nearby and sensitive populations throughout the community (such as those living immediately adjacent to the Sibley Mill – across a fence line) will be protected from contaminants utilizing standard safety features. Since the environmental work proposed to be conducted through this grant includes excavation of soils, transportation of the soils off-property, and transporting and placing clean material to cap the remaining contaminated surface soils, an exposure threat does exist. Appropriate measures, such as signs and/or barricades, will be utilized as appropriate to prevent people from accessing the site during cleanup activities. In addition, dust suppression methods, such as watering of soils/dust as they are disturbed, will be used to prevent airborne exposure. Physical controls shall also include silt fencing, erosion control, and storm water controls to prevent sediments from migrating offsite and impacting two important waterways (the Savannah River and the Augusta Canal). A community meeting will be held prior to initiation of work on the site to let community members know what to expect and to answer their questions and concerns. Truck routes, hours of operation, dust control, etc. will be addressed. The Georgia Department of Public Health, East Central Health District will be invited to answer questions and concerns about the impacts of hazardous substances and the importance of their remediation for the community.

b) Partnerships with Government Agencies:

We have been working with GA EPD staff since 2009 to address the environmental concerns associated with Sibley Mill. Ms. Madeleine Kellam, Brownfields Coordinator for the GA EPD, encouraged the ACA to submit this EPA Brownfields Cleanup Application to continue the cleanup on the site. GA EPD has pledged to continue their support and oversight of cleanup activities under the established CAP. A letter of support is included with the Threshold Criteria.

Georgia Department of Public Health, East Central District will provide a professional staff member to serve on the proposed Brownfields Task Force and serve as a resource concerning the impacts of hazardous substances and the importance of their remediation for the community. A letter of support is included.

c) Partnerships with Community Organization:

Community-based organizations are essential to the neighborhood's brownfields redevelopment strategy, and the following organizations have committed to support the project. Letters of support are included as attachments.

Organization	Purpose of Organization	Description of Support
Harrisburg-West End Neighborhood Association	Revitalization of Harrisburg Neighborhood.	Serve on Task Force & facilitate neighborhood meetings to keep residents abreast of progress.
Salvation Army Kroc Center	Provide community support services for Harrisburg residents in new state of the art facility	Provide meeting space for Task Force as well as advertise project updates and disseminate information throughout the Center.
Augusta Tomorrow, Inc.	Private organization committed to the revitalization of Augusta and implementing the 2009 Harrisburg Master Plan.	Financially supported the Blueprints Project and will continue to support efforts by serving on the task force.
GA Conversancy	Protect GA's land & water resources, preparation of Blueprints for Successful Communities	Completed Blueprint for Harrisburg. Continue working with ACA and neighborhood to revitalize area & Sibley Mill. Serve on Task

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		Force.
Flywheel LLC (formerly Augusta Capital LLC)	Private development company specializing in redevelopment of vacant historic properties.	Contributed value of prior environmental assessments & redevelopment design plans. Interested in redeveloping Sibley Mill upon completion of brownfield cleanup.
Georgia Regents University	Provide leadership and excellence in teaching, discovery, clinical care and service as a student-centered comprehensive research university and academic health center	Considering Sibley Mill for future space needs.
Augusta Planning & Development Department	Designated city agency for all planning, development, permit & inspections activities.	Will Serve on Task Force and provide technical assistance on redevelopment plan.

4. PROJECT BENEFITS

a) Health and/or Welfare and Environment:

The northern parcel of Sibley Mill has documented soil contamination that has not been remediated. The environmental remediation (soil removal and capping) planned with these grant funds will be one more step in the right direction toward site redevelopment. By removing a portion of the impacted site soils and installing a barrier to prevent exposure to the remaining impacted site soils, the threats to the physical health and welfare of community residents (including those immediately across the fence from an entire block of low-income/minority housing) will be immediately reduced. Furthermore, contaminant migration through soil, groundwater and surface water will be eliminated.

Environmental cleanup of the Sibley Mill will make it more attractive to a developer who will meet the community's desires for a mixed use redevelopment with community gardens, green spaces, and linked trails to the canal as expressed in the November 21, 2011, visioning session for Sibley Mill and the "Blueprints for Successful Communities." Seeing the trucks of contaminated soil shipped off the site will help improve the emotional health of the community. Residents will see active steps being taken to prepare the historic mill for redevelopment. Those who had been afraid to dream of a revitalized mill akin to the Enterprise and Granite Mills will be able to believe that change can also come to their community. As the neighborhood begins to turn around, crime will be reduced, when there are no longer vacant and dilapidated homes available for illicit activities. Residents will then once again be able to sit on their porch – listening to the laughter of children versus the sounds of guns. The spark of community pride that currently exists in this area will be spread by the site's cleanup and redevelopment.

Those who own homes in Harrisburg have fought long and hard to revitalize their historic neighborhood. Many have deep roots, being descendants of original mill workers. Their efforts to improve the neighborhood have given them a seat at the visioning table, ensuring that they will not be pushed out when the new development occurs, but will rather benefit the most from it. Working with the community, we have put strategies in place to ensure *committed* and *equitable redevelopment* of the neighborhood, anchored by the renewed Sibley Mill.

b) Environmental Benefits from Infrastructure Reuse/Sustainable Reuse:

i. Planning and Policies:

The sustainable redevelopment of the Sibley Mill has been a goal of the planning process since its original development, when materials from the Confederate Powder Works were recycled into the existing structure. To preserve the historic importance of the mill, the original structures will remain in place for the adaptive reuse of the property for mixed residential and business/commercial use. The ACA is well versed in the concept of sustainable reuse, as evidenced by their partnership in the redevelopment of Enterprise and Granite Mills, both LEED certified buildings that use green electrical energy from hydroelectric stations operated by ACA, low-flow plumbing fixtures, energy efficient windows, and upgraded HVAC systems. The

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plan for Sibley Mill includes reduced resource consumption via the same methods and principles and is also slated to achieve LEED certification. Additional sustainable design features that will reduce and minimize storm water runoff and non-point source pollution have been incorporated, such as harvesting of rainwater, bioswales, and roof gardens. This is expected to minimize any potential negative impacts to these waterways while increasing the rate of groundwater recharge in the area. With the reduction in the volume of water potentially discharging to these waterways, bank erosion will also be reduced, which will in turn prevent loss of habitat and aquatic life.

Furthermore, the mill property currently draws water from the Augusta Canal to power the on-site hydroelectric plant. The hydroelectric plant, a green renewable energy source, produces approximately 16 million kilowatt-hours each year. This is more than sufficient to provide for the energy needs of the mill following redevelopment.

ii. Example Efforts

By cleaning up and redeveloping the former Sibley Mill, the six Livability Principles will be achieved, as follows: 1) Provide more transportation choices – linking the Harrisburg neighborhood to the former mill property via a system of trails and greenspace allows for increased walkability, including connectivity to jobs at the redeveloped mill and services and programs at the nearby Kroc Center, such as childcare for those in the working community; 2) Promote equitable, affordable housing – addressing the former mill that is the currently the centerpiece of a predominantly low income, minority neighborhood will spread to the surrounding neighborhood and enhance housing choices as well as promote the care and redevelopment of affordable housing; 3) Increase economic competitiveness – the redevelopment of this property into mixed use residential/commercial/business space will generate jobs and business opportunities for those in the nearby community; 4) Support existing communities – the community has worked together to involve residents that are most affected by this property, strengthening the sense of community between the groups as issues are addressed and environmental issues resolved; 5) Leverage Federal investment – in addition to the EPA funding, ACA will leverage funds from the NPS, HUD, and DOT to achieve the overall redevelopment goals; and 6) Value communities and neighborhoods – the program's focus is on the historic mill property and its surrounding mill village, with the primary goal to restore the sense of community that was lost years ago.

c) *Economic and Community Benefits:*

i) *Economic Benefits:*

Planned redevelopment of the former Sibley Mill is ambitious. Based on information from the Enterprise and Granite Mills (located nearby and with similar redevelopments), we anticipate that upon completion of the \$30 million project, the City will realize a 30% increase in local tax revenue. As a government-owned property, the mill is currently generating zero tax revenue. Once it is redeveloped and under private ownership, it will once again be a tax generating property, thus the large percentage increase to the tax revenue. Local taxes in 2010 prior to ACA's ownership of the property were \$11,579 based on \$800,000 fair market value. Based on a fair market value of \$30,000,000 (cost developer anticipated investing in redevelopment of mill – not environmental cleanup) would yield local taxes of \$434,196. Additionally, 175 jobs are anticipated during construction and 20 permanent jobs upon completion. We believe these estimates are conservative based on current market conditions. As the economy recovers and consumer spending increases, these financial estimates are expected to increase. Additionally, as the site is cleaned up and redeveloped consistent with the plan created through the Blueprints program, new and existing businesses will spur the creation of more jobs and, therefore, economic conditions in the neighborhood will

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improve. For every \$1 of the EPA Brownfields funding expended, grant recipients have seen over \$18 of additional investment.¹

ii. Job Creation Potential:

An EPA Brownfields Job Training project was recently completed in nearby Aiken County, South Carolina (just across the Savannah River from Augusta), as part of the Community Development & Improvement Corporation's initiative to train individuals impacted by the close of the Graniteville Mills. The nine-week program anticipates training 45 students in environmental jobs over the course of the grant's period of performance. The ACA will include a preference in selecting cleanup contractors who hire staff from the job training program that was created specifically to help former textile workers prepare for new trades. Additionally, the ACA will include a preference in its procurement process for cleanup contractors who hire within the Harrisburg neighborhood. As previously stated, ACA anticipates the creation of approximately 175 construction related jobs and 20 permanent jobs upon site completion.

5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a) *Programmatic Capability:*

The ACA, with assistance from a qualified contractor, has the ability to effectively manage and oversee all phases of the remediation work under this grant. Mr. Dayton Sherrouse, Executive Director of the ACA, will serve as the project director. Mr. Sherrouse has over 40 years of public/private service with planning and development agencies in the Augusta area including the Executive Director of the Planning Commission, County Administrator for Richmond County, Executive Vice President of Augusta Tomorrow, Inc. and as Executive Director of the Augusta Canal National Heritage area for the last 15 years. He has a proven record of successful federal grant management and development experience. Assisting him will be Mr. Darren Meadows, attorney for the ACA. Prior to his employment with ACA, Mr. Meadows was employed by the GA EPD as the Program Attorney for Environmental Programs and is, therefore, experienced with environmental cleanups. In addition to the Project Director and his assistant, ACA will contract with an environmental firm that has expertise in all aspects of brownfield cleanup and redevelopment. After releasing a Request for Qualifications in December 2012 following the procurement guidelines established in 49 CFR 31.36, the ACA selected a qualified consultant to assist with all brownfield-related projects. With our project team already in place, we will be able to begin project activities immediately upon grant award.

b) *Adverse Audits:*

The ACA has received no adverse audit findings.

c) *Past Performance and Accomplishments*

i. Currently Has an EPA Brownfields Assessment, Revolving Loan Fund, or Cleanup Grant

The ACA was awarded an EPA Brownfields Cleanup Cooperative Agreement in the Fall of 2013 for the cleanup of the southern parcel of Sibley Mill. The project is currently on schedule and making progress towards completing the cleanup activities. ACA continues to comply with the Work Plan, Schedule, and Terms and Conditions. ACA will submit the first required quarterly progress report and MBE/WBE utilization form on time, and the initial information for the site has been entered into ACRES. Our current cleanup cooperative agreement has funds remaining but is a site-specific award; therefore, additional funds are needed to address the contamination on the northern parcel (subject property) of Sibley Mill. Accomplishments to date include hosting the kickoff meeting, forming the task force, holding the first task force meeting, and submitting the Community Involvement Plan. In addition, the Quality Assurance Project Plan and the Health and Safety Plan will be submitted within the month.

¹ EPA Brownfields Benefits Postcard: <http://www.epa.gov/brownfields/overview/Brownfields-Benefits-postcard.pdf>; October 2011.

² "Measuring the Economic Value of a City Park System", The Trust for Public Land, 2009

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THRESHOLD CRITERIA FOR CLEAN-UP GRANTS

1. APPLICANT ELIGIBILITY

- a. The Augusta Canal Authority (ACA) is a public body corporate and politic of the State of Georgia having been created by an Act of the General Assembly of Georgia in 1989. Documentation of this status is included as Attachment 1.
- b. ACA purchased the property on August 31, 2010.

2. LETTER FROM STATE OR TRIBAL ENVIRONMENTAL AUTHORITY

Madeleine Kellam, Brownfields Coordinator for the Georgia Department of Natural Resources Environmental Protection Division (GA EPD) issued a letter acknowledging this grant proposal and their support of the planned cleanup activities at the former Sibley Mill in Augusta, GA. The GA EPD letter is included as an Attachment 2.

3. SITE ELIGIBILITY AND PROPERTY OWNERSHIP ELIGIBILITY

Site Eligibility

a. Basic Site Information

- (a) Former Sibley Mill
- (b) 6.33-acre northern portion of 1717 Goodrich Street, Augusta, Georgia 30901
- (c) Augusta Canal Authority
- (d) Owned property since August 31, 2010

b. Status and History of Contamination at the Site

- (a) Hazardous substances
- (b) Originally constructed in 1881, the site operated continuously as a textile mill until it closed in 2006. Prior to use as a textile mill, the property was utilized by the Confederate States of America's Powder Works for the manufacture of gunpowder, ammunition, and other war materials. As a textile mill, Sibley operated a full line textile operation with bales of cotton entering one side of the complex and finished denim departing the other side. Towards the end of the mill's use, it was primarily a dyeing facility for denim jean material. Manufacturing operations were powered at the mill via hydroelectric power – drawing water from the Augusta Canal. The property has been idle since operations ceased in 2006.
- (c) Analytical results from environmental assessments documented several areas of contamination across the site with exceedances of metals (lead, arsenic, cadmium, mercury, barium, chromium, and selenium) above Georgia's Type 1 Risk Reduction Standards. Additionally, several semi-volatile organic compounds (SVOCs) (benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, dibenz(a)anthracene, indeno(1,2)disulfide, phenanthrene, acetophenone), and volatile organic compounds (VOCs) (tetrachloroethene, trichloroethene, benzene, and carbon disulfide) were also found in site soils above Georgia's Type 1 Risk Reduction Standards. The most extensive contamination is from lead and mercury.
- (d) The property became contaminated from over 120 years of operation as a textile mill including poor disposal practices, although the lead and mercury contamination may be attributed to the property's previous use as an ammunitions facility. Soil contamination on the northern parcel appears to be over a 1.5-acre area to a depth of approximately 6 feet, except in a 25-foot by 25-foot area where soils are impacted to 12 feet.

c. Sites Ineligible for Funding

- (a) This property is NOT listed or proposed for listing on the National Priorities List.
- (b) This property is NOT subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.

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- (c) This property is NOT subject to the jurisdiction, custody, or control of the United States government.
- d. **Sites Requiring a Property-Specific Determination**
This property does NOT require a property-specific determination.
- e. **Environmental Assessment Required for Cleanup Proposals**
A Phase I ESA was performed in conformance with ASTM E1527-05 by Advanced Environmental Options, Inc. with a report being issued on June 20, 2007. Advanced Environmental Options, Inc. also completed a limited Phase II ESA concurrent to the Phase I ESA and compiled the results with the June 20, 2007 report. A more comprehensive Phase II ESA, Asbestos Survey, and Lead Based Paint Survey were completed by Advanced Environmental Options, Inc. with a report being issued on October 31, 2007. An additional Phase II ESA was completed by Advanced Environmental Options, Inc. with a report being issued on April 30, 2008. A UST Closure (including soil and groundwater sampling) was completed by American Environmental Options, Inc. in accordance with the Georgia Underground Storage Tank Closure Guidance Document (GUST-9) with the report being issued on April 30, 2008.

Prior to the purchase of the property, an updated Phase I & II Environmental Assessment was completed for the site by American Environmental & Construction Services, Inc. in May 2010. Based on the findings of this assessment a Prospective Purchaser Corrective Action Plan (PPCAP) and an application for approval as a Brownfield site were submitted to the Georgia Environmental Protection Division (GA EPD) for approval under the Georgia Hazardous Site Reuse and Redevelopment Act. On August 26, 2010, The GAEPD approved the PPCAP and confirmed that the site met the Brownfields qualifying criteria established under the Act.

Property Ownership Eligibility

- f. **CERCLA §107 Liability**
Augusta Canal Authority is **NOT** potentially liable for contamination at the site under CERCLA §107. ACA acquired the facility on August 31, 2010, after performing a Phase I ESA and receiving confirmation of GA EPD's approval of the Prospective Purchaser Corrective Action Plan, including their conferring of a provisional limitation of liability to ACA. The Prospective Purchaser Corrective Action Plan and limited liability agreement became effective August 26, 2010. As a part of entering into the Prospective Purchaser Corrective Action Plan and limited liability agreement with GA EPD, ACA certifies that is not a current or former subsidiary, division, parent company, or partner; or employer or former employer; or otherwise affiliated with the current owner of the property or any person who has contributed to a release at the property, and certifies that it and its members are Non-responsible Parties at the Site and are eligible to be a **Bona Fide Prospective Purchaser** for the Property. ACA did not own or operate the facility at the time of disposal of a hazardous substance, has never arranged for the treatment or disposal of hazardous substances at the site, nor has accepted hazardous substances for transport for disposal or treatment at the site. The Prospective Purchaser Corrective Action Plan and limited liability agreement with GA EPD protects qualified prospective purchasers from legal action related to existing contamination found at the property.
- g. **Enforcement Actions**
ACA is not aware of any ongoing or anticipated environmental enforcement actions related to the brownfield site for which funding is sought. ACA is not aware of any other inquiry from federal, state, or local government entities regarding the responsibility of any party (including the ACA) for the contamination or hazardous waste at the site, including liens. ACA is not aware of any order from federal, state, or local government entities regarding the responsibility of any party (including the ACA) for the contamination or hazardous waste at the site.

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h. Information on Liability and Defenses/Protections

i) Information on Property Acquisition:

- ACA purchased the property via a negotiated purchase from a private corporation.
- ACA purchased the property on August 31, 2010.
- ACA is the sole owner of the property and has fee simple title.
- ACA purchased the property from Avondale Mills, Inc.
- ACA does not and never has had familial or corporate relationships or affiliations with prior owners, operators, and/or potentially responsible parties of the property, including Avondale Mills, Inc. from whom ACA purchased the property.

ii) Timing and/or Contribution Toward Hazardous Substances Disposal: All disposal of hazardous substances at the property occurred before ACA acquired the property. ACA has not and did not cause or contribute to the release of any hazardous substances on the property. ACA has not arranged for the disposal of hazardous substances at the property or transported hazardous substances to the property.

iii) Pre-Purchase Inquiry:

Avondale Mills, Inc. ceased operation of the Sibley Textile Mill in July 2006. However, they continued to operate the hydroelectric plant located at the site. Following liquidation of the equipment, Avondale actively pursued sale of the site. Avondale completed the following environmental activities and assessments as a part of their due diligence prior to sale of the site:

- Phase I Environmental Site Assessment prepared by Advanced Environmental Options, Inc., Spartanburg, SC, June 2007. This Phase I ESA was performed in conformance with ASTM E1527-05 and the EPA's All Appropriate Inquiries rule (70FR66070).
- Phase II Environmental Site Assessment prepared by Advanced Environmental Options, Inc., Spartanburg, SC, October 2007.
- UST Closure Report by Advanced Environmental Options, Inc., Spartanburg, SC, April 2008 for removal of a 3,000 gallon underground storage tank holding #6 fuel oil for back up heat.
- Advanced Environmental Options, Inc. is a full-service environmental company. AEO performed all assessments completed in 2007-2008. Founded in 2001, AEO provides comprehensive environmental services and support to engineering and consulting firms throughout the southeast with remediation support services, waste transportation and disposal, and on-site and emergency response services. Environmental professionals, as defined by AAI, on staff at Advanced Environmental Options completed the Phase I and II assessments.

Augusta Capital signed an option in May 2007 to purchase the site and completed the following environmental assessment/activities prior to cancelling the option in October 2008:

- Soil Sampling Report, Alternative Construction and Environmental Solutions, Inc., Augusta, GA, August 2007.
- Review and Update of prior environmental assessments, Alternative Construction and Environmental Solutions, Inc., Augusta, GA, January 2008.

The Augusta Canal Authority signed an option to purchase the property in February 2010. As a part of the All Appropriate Inquiries (AAI) process the Authority completed the following activities prior to purchase:

- Report of Environmental Investigation Activities and Proposed Remedial Action For Sibley Mill, American Environmental & Construction Services, Inc., Alpharetta, GA, May 2010. This report also updated the Phase I and II assessments prepared by

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Advanced Environmental Options, Inc. in 2007 and by Alternative Construction and Environmental Solutions, Inc. in 2008. This update was conducted within 180 days of the ACA's acquisition of the property.

- Prospective Purchaser Brownfield Application and Corrective Action Plan, American Environmental & Construction Services, Inc., Alpharetta, GA, June 2010, approved by GA EPD, August 26, 2010.
- American Environmental & Construction Services, Inc., is a full-service environmental remediation and construction services firm. Founded in 1997, they provide high quality environmental and construction services to government and commercial clients nationwide. Environmental professionals, as defined by AAI, on staff at American Environmental & Construction Services completed the updated Phase I and II assessments.

iv) Post-Acquisition Uses: Since the purchase by ACA, the subject property has not been used.

v) Continuing Obligations: Upon acquisition of the property, ACA has taken steps to stop any continuing releases from impacting human health and/or the environment. Pursuant to the Corrective Action Plan approved by GA EPD, ACA completed the first steps of the required environmental remediation, which focused on source removal. In November 2011, the following activities were completed:

- Removal and disposal of caustic soda tanks and associated piping,
- Removal and disposal of dye tanks and associated piping,
- Removal and disposal of mercury in the boiler room from the gauges and trenches, and
- Removal and disposal of flooring from one site building that was contaminated with herbicides and pesticides.

Upon acquisition of the property, ACA has limited access to the site (except for official personnel) by fencing it, thereby limiting exposure to previously released hazardous substances.

Upon acquisition of the property, ACA has prevented any threatened future releases by addressing potential source areas as described above and by limiting access to official personnel.

ACA confirms:

- that it will comply with any land-use restrictions and institutional controls as required by GA EPD, the Limitation of Liability Agreement, and/or any future restrictive covenant, if required;
- that it will cooperate with those performing the cleanup and provide access to the property;
- that it will comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; however, to the best of ACA's knowledge, there are no information requests or administrative subpoenas that have been issued; and
- that it will provide all legally required notices for this property.

4. CLEANUP AUTHORITY AND OVERSIGHT STRUCTURE

- a. ACA has entered into a Limitation of Liability Agreement with GA EPD, and a Corrective Action Plan has been approved which requires compliance with specific Risk Reduction Standards. ACA will work closely with the assigned EPA Region 4 project manager and GA EPD to ensure the cleanup is completed in a manner which is protective of human health and the environment.

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ACA has procured the technical expertise of a brownfield/environmental consultant to manage, oversee, and complete the cleanup activities at the Former Sibley Mill. ACA will select the qualified consultant with brownfields experience through a competitive process in accordance with the competitive procurement provisions of 40 CFR 31.36.

- b. The Phase II ESAs are complete and the nature and extent of soil contamination defined. It is unlikely that impact has occurred on adjacent properties. However, if off-property access is necessary for any of the proposed removal activities, ACA owns one of the adjacent parcels, and ACA personnel know and have a good working relationship with other adjacent property owners.

5. COST SHARE

Total remedial costs required to complete the work outlined in the approved Corrective Action Plan exceed \$3 million. Due to the significant costs, ACA is taking a phased approach over the next several years. The first phase was completed in November 2011 and cost \$242,695. ACA plans to use funds from this EPA Hazardous Cleanup Grant to remove 1,100 yd³ of contaminated soils in one area and place an engineered cap over approximately 1.2-acres of contaminated soil on another area the property. The estimated cost is \$240,000. ACA will provide for the required 20% cost share via a cash contribution by directly paying for \$40,000 of the site cleanup using funds from the Special Purpose Local Option Sales tax. ACA's commitment to meet the required cost share is included in the cover letter. Additional phases will include the removal of a fuel oil above ground storage tank and remediation of soils on adjacent parcels.

6. COMMUNITY NOTIFICATION

ACA placed a written advertisement in *The Augusta Chronicle* on December 15 and 16, 2013, announcing their proposed cleanup plan for the subject parcel of the Former Sibley Mill and our intent to apply for an EPA Brownfields Cleanup Grant. The public notice informed readers that both the draft Analysis of Brownfields Cleanup Alternatives (ABCA) and grant application were available for review and comment at the ACA office located at 1450 Greene Street, Augusta, Georgia. The notice stated that the draft grant application would be available from December 18, 2013, until January 17, 2014, and that the draft ABCA was available from December 18, 2013 until January 17, 2014. Additionally, the public was invited to attend a public meeting on December 17, 2013, at TIME at the Salvation Army Kroc Center's Music room located at 1833 Broad Street across the canal from the former Sibley Mill. A copy of this advertisement is included as Attachment 3. The draft ABCA was revised based upon comments received and is included as Attachment 4. The sign-in sheet, comments received, and our responses from the public meeting held on December 17, 2014 at 6PM at the Salvation Army Kroc Center are included in this grant application as Attachment 5.

AUGUSTA CANAL AUTHORITY - CREATION.
No. 289 (House Bill No. 942).

AN ACT

Creating the Augusta Canal Authority; to provide for definitions; to provide for the purposes of the authority; to provide for membership of the authority, to provide for the appointment, terms, and eligibility for reappointment of the members of the authority; to provide for a quorum; to provide for officers; to provide for filling vacancies; to provide for the removal of members; to describe conflicts of interest and penalties for violations; to provide for powers of the authority; to provide for the issuance of revenue bonds generally, to provide for the applicability of the "Revenue Bond Law"; to provide for the authorized contents of agreements of the authority generally; to provide for the use of proceeds, subsequent issues, and bond anticipation notes; to provide that obligations of the authority shall not be obligations of the state or political subdivisions thereof; to provide for the constitutional authority for enactment of this Act and tax exemption; to provide for the applicability of the "Georgia Securities Act of 1973"; to provide for the effect of this Act under a successor government; to provide for the construction of this Act; to declare powers supplementary; to provide for supplementary; to repeal conflicting laws; and for other purposes.

BE IT ENACTED BY THE GENERAL ASSEMBLY OF GEORGIA:

Section 1. Creation of authority. There is created the Augusta Canal Authority, which shall be an instrumentality and political subdivision of the State of Georgia and a public corporation. The authority may contract and be contracted with, sue and be sued, plead and be impleaded, and complain and defend in all courts of law and equity.

Section 2. Definitions. As used in this Act, the term:

(1) "Authority" means the "Augusta Canal Authority" created by this Act.

(2) "Cost of the project" or "cost of any project" means and includes:

(A) All costs of acquisition, by purchase or otherwise, construction, assembly, installation, modification, renovation, or rehabilitation incurred with any project or any part of any project;

(B) All costs of real property, fixtures, or personal property used in or in connection with or necessary for any project or for any facilities related thereto, including, but not limited to, the cost of all land, estates for years, easements, rights, improvements, water rights, connections for utility services, fees, franchises, permits, approvals, licenses, and certificates; the cost of securing any such franchises, permits, approvals, licenses, or certificates; and the cost of preparation of any application therefor and the cost of all

fixtures, machinery, equipment, furniture, and other property used in or in connection with or necessary for any project;

(C) All financing charges and loan fees and all interest on revenue bonds, notes, or other obligations of the authority which accrue or are paid prior to and during the period of construction of a project and during such additional period as the authority may reasonably determine to be necessary to place such project in operation;

(D) All costs of engineering, surveying, and architectural and legal services and all expenses incurred by engineers, surveyors, architects, and attorneys in connection with any project;

(E) All expenses for inspection of any project;

(F) All fees of fiscal agents, paying agents, and trustees for bondholders under any trust agreement, indenture of trust, or similar instrument or agreement; all expenses incurred by any such fiscal agents, paying agents, and trustees; and all other costs and expenses incurred relative to the issuance of any revenue bonds, notes, or other obligations for any project;

(G) All fees of any type charged by the authority in connection with any project;

(H) All expenses of or incidental to determining the feasibility or practicability of any project;

(I) All costs of plans and specifications for any project;

(J) All costs of title insurance and examinations of title with respect to any project;

(K) Repayment of any loans made for the advance payment of any part of any of the foregoing costs, including interest thereon and any other expenses of such loans;

(L) Administrative expenses of the authority and such other expenses as may be necessary or incidental to any project or the financing thereof or the placing of any project in operation; and

(M) The establishment of a fund or funds for the creation of a debt service reserve, a renewal and replacement reserve, or such other funds or reserves as the authority may approve with respect to the financing and operation of any project and as may be authorized by any bond resolution, trust agreement, indenture of trust, or similar instrument or agreement pursuant to the provisions of which the issuance of any revenue bonds, notes, or other obligations of the authority may be authorized.

Any cost, obligation, or expense incurred for any of the foregoing purposes shall be part of the cost of the project and may be paid or reimbursed as such out of proceeds of revenue bonds, notes, or other obligations issued by the authority.

(3) "Governing body" means the elected or duly appointed officials constituting the governing body of the City of Augusta or any successor government to the City of Augusta.

(4) "Member" means a member of the authority established by this Act.

(5) "Project" means any undertaking of the authority in connection with the revitalization and development of the City of Augusta within a project area, and shall be declared to include the creation of parks and recreation areas; buildings to be constructed and used for the housing of exhibits, exhibition purposes, amusement or educational purposes, or any combination of the above; public parking areas and public parking buildings; causeways, tunnels, viaducts, bridges, and other crossings; thoroughfares, parkways, and any avenue of traffic; and all other buildings, structures, or facilities useful and desirable in connection therewith, extension and improvements of such facilities, and the acquisition of the necessary property therefor, both real and personal, in order to accomplish the essential public purpose for which the authority is created.

(6) "Project area" means any contiguous tract of land, a portion of which fronts on either side of the Augusta Canal, or any structure linking a tract of land on one side of the Augusta Canal to a tract of land on the opposite side of the Augusta Canal. A contiguous tract of land is deemed to mean any parcel or parcels of land which are contiguous except for the interposition of a road, street, stream, or similar property. Otherwise, parcels are contiguous if their boundaries meet at one or more points.

(7) "Revenue bonds" or "bonds" means any bonds of the authority which are authorized to be issued under the Constitution and laws of the State of Georgia, including refunding bonds but not including notes or other obligations of the authority.

Section 3. Purposes of the authority. (a) It is determined, declared, and established that the purpose of the authority is to promote the revitalization and development of the City of Augusta through the creation in the project areas of parks, recreation areas, and all other facilities useful or desirable in connection therewith. The creation of such areas is intended to develop and promote for the public good and general welfare trade, tourism, commerce, industry, and employment opportunities and to promote the general welfare of this state by creating a climate favorable to the location of new industry, trade, and commerce and the development of existing industry, trade, commerce, and tourism opportunities within the City of Augusta.

(b) It is determined, declared, and established that the creation of the authority and the implementation of the corporate purposes set forth in this Act is in all respects for the benefit of the people of this state generally and for the people residing in the City of Augusta and surrounding areas of the State of Georgia specifically; and it is further declared that the revitalization and development of the project areas are proper public purposes and this Act is adopted for the purposes of promoting and expanding for the public good and welfare the public facilities of said areas, including the construction of streets, roadways, and parks and for the purposes of acquiring, constructing, adding to, extending, improving, equipping, maintaining any and all facilities useful or desirable in connection therewith, acquiring the necessary property therefor, both real and

personal, with the right to contract for the use of or to lease or sell any or all of such facilities, including real property, and to do any and all things deemed by the authority necessary, convenient, or desirable for and incident to the efficient and proper development, revitalization, modernization, and operation thereof.

(c) It is further found, determined, and declared that all property of said authority is declared and shall in all respects be considered to be public property and title to such property shall be held by the authority only for the benefit of the public, and the use of such property pursuant to the terms of this Act shall be and is declared to be for public and governmental purposes, that is, for the promotion of the general public welfare in matters of cultural development, education, pleasure, convenience, and recreation of the public at large, in an effort to better the general condition of society or that considerable part of society residing in the City of Augusta and surrounding areas of the State of Georgia, which promotion is declared to be a public beneficence for the good of humanity and for the general improvement and happiness of society, and all the property, income, obligations, and interest on the obligations of the authority and the transfer thereof shall be and are declared to be nontaxable for any and all purposes.

Section 4. Authority; membership. The authority shall be composed of five members who shall be residents and qualified voters of the City of Augusta. The governing body of the City of Augusta shall appoint two members of the authority who shall each serve for an initial term of three years and three members who shall each serve for a term of six years. After expiration of the initial terms, the terms of all members shall be 6 years. If at the end of any term of office of any member a successor to such member has not been appointed, the member whose term of office has expired shall continue to hold office until his successor is appointed. A majority of the authority shall constitute a quorum. Any member of the authority otherwise qualified shall be eligible for reappointment unless such member has served for two consecutive terms, in which case said member shall not be eligible for reappointment until after a period of one year's absence from authority membership.

Section 5. Officers. The members shall elect one of their number as chairman and another as vice chairman and shall also elect a secretary and a treasurer or a secretary-treasurer, either of whom may but need not be a member. The members shall receive no compensation for their services but shall be reimbursed for actual expenses incurred in the performance of their duties. The authority shall have perpetual existence.

Section 6. Vacancies in authority. Should an appointed member vacate his office either by resignation, death, change of residence, or removal as provided in Section 7 of this Act or for any other reason, the governing body of the City of Augusta shall, as soon as practicable, appoint another qualified person to serve as a member of the authority for the unexpired term.

Section 7. Removal of members. Any member may be removed from office for good cause affecting his ability to perform his duties as a member, for misfeasance, malfeasance, or nonfeasance in office, or for violating the conflicts of interest provisions of this Act, by vote of three of the other members, but only after a public hearing at which such member is given the right to present evidence in his own behalf and only upon a finding by three of the other members that good cause for removal affecting the member's ability to perform his duties as a member exists,

that he was guilty of misfeasance, malfeasance, or nonfeasance in office, or that he violated the conflicts of interest provisions of this Act.

Section 8. Conflicts of interest. No member of the authority or officer or employee thereof shall have a financial interest, direct or indirect, in any contract with the authority, or be financially interested, directly or indirectly, in the sale to the authority of any lands, material, supplies, or services, except on behalf of the authority as a member, officer, or employee thereof. Any violation of this provision by a member of the authority shall be grounds for removal pursuant to Section 7 of this Act. Any violation of this provision by any officer or employee of the authority who is not also a member of the authority shall be grounds for removal by vote of three members of the authority.

Section 9. Powers of the authority. (a) The authority shall have all of the powers necessary or convenient to carry out and effectuate the purposes and provisions of this Act including, without limiting the generality of the foregoing, the power:

- (1) To bring and defend actions;
- (2) To adopt and amend a corporate seal;
- (3) To make and execute contracts, agreements, and other instruments necessary or convenient to exercise the powers of the authority or to further the public purpose for which the authority is created, including, but not limited to, contracts for construction of projects, leases of projects, contracts for sale of projects, agreements for loans to finance projects, and contracts with respect to the use of projects;
- (4) To acquire by purchase, lease, or otherwise and to hold, lease, and dispose of real and personal property of every kind and character, or any interest therein, in furtherance of the public purpose of the authority;
- (5) To finance, by loan, grant, lease, or otherwise, and to construct, erect, assemble, purchase, acquire, own, repair, remodel, renovate, rehabilitate, modify, maintain, extend, improve, install, sell, equip, expand, add to, operate, or manage projects and to pay the cost of any project from the proceeds of revenue bonds, notes, or other obligations of the authority or any other funds of the authority or from any contributions or loans by persons, corporations, partnerships, whether limited or general, or other entities, all of which the authority is authorized to receive, accept, and use;
- (6) To borrow money to further or carry out its public purpose and to execute revenue bonds, notes, other obligations, leases, trust indentures, trust agreements, agreements for the sale of its revenue bonds, notes, or other obligations, loan agreements, mortgages, deeds to secure debt, trust deeds, security agreements, assignments, and such other agreements or instruments as may be necessary or desirable, in the judgment of the authority, to evidence and to provide security for such borrowing;

(7) To issue revenue bonds, notes, or other obligations of the authority and use the proceeds thereof for the purpose of paying, or loaning the proceeds thereof to pay, all or any part of the cost of any project and otherwise to further or carry out the public purpose of the authority and to pay all costs of the authority incidental to, or necessary and appropriate to, furthering or carrying out such purpose;

(8) To make application directly or indirectly to any federal, state, county, or municipal government or agency or to any other source, whether public or private, for loans, grants, guarantees, or other financial assistance in furtherance of the authority's public purpose and to accept and use the same upon such terms and conditions as are prescribed by such federal, state, county, or municipal government or agency or other source;

(9) To enter into agreements with the federal government or any agency thereof to use the facilities or services of the federal government or any agency thereof in order to further or carry out the public purposes of the authority;

(10) To contract for any period, not exceeding 50 years, with the State of Georgia, state institutions, or any municipal corporation or county of this state for the use by the authority of any facilities or services of the state or any such state institution, municipal corporation, or county, or for the use by any state institution or any municipal corporation or county of any facilities or services of the authority, provided that such contracts shall deal with such activities and transactions as the authority and any such political subdivision with which the authority contracts are authorized by law to undertake;

(11) To extend credit or make loans to any person, corporation, partnership, whether limited or general, or other entity for the costs of any project or any part of the costs of any project, which credit or loans may be evidenced or secured by loan agreements, notes, mortgages, deeds to secure debt, trust deeds, security agreements, assignments, or such other instruments, or by rentals, revenues, fees, or charges, upon such terms and conditions as the authority shall determine to be reasonable in connection with such extension of credit or loans, including provision for the establishment and maintenance of reserve funds; and, in the exercise of powers granted by this Act in connection with any project, the authority shall have the right and power to require the inclusion in any such loan agreement, note, mortgage, deed to secure debt, trust deed, security agreement, assignment, or other instrument such provisions or requirements for guaranty of any obligations, insurance, construction, use, operation, maintenance, and financing of a project, and such other terms and conditions, as the authority may deem necessary or desirable;

(12) As security for repayment of any revenue bonds, notes, or other obligations of the authority, to pledge, mortgage, convey, assign, hypothecate, or otherwise encumber any property of the authority, including, but not limited to, real property, fixtures, personal property, and revenues or other funds, and to execute any lease, trust indenture, trust agreement, agreement for the sale of the authority's revenue bonds, notes, or other obligations, loan agreement, mortgage, deed to secure debt, trust deed, security agreement, assignment, or other agreement or instrument as may be necessary or desirable, in the

judgment of the authority, to secure any such revenue bonds, notes, or other obligations, which instruments or agreements may provide for foreclosure or forced sale of any property of the authority upon default in any obligation of the authority, either in payment of principal, premium, if any, or interest or in the performance of any term or condition contained in such agreement or instrument. The State of Georgia, on behalf of itself and each county, municipal corporation, political subdivision, or taxing district therein, waives any right it or such county, municipal corporation, political subdivision, or taxing district may have to prevent the forced sale or foreclosure of any property of the authority upon such default and agrees that any agreement or instrument encumbering such property may be foreclosed in accordance with the laws of this state and the terms thereof;

(13) To receive and use the proceeds of any tax levied by a municipal corporation to pay the costs of any project or for any other purpose for which the authority may use its own funds pursuant to this Act,

(14) To receive and administer gifts, grants, and devises of money and property of any kind and to administer trusts;

(15) To use any real property, personal property, or fixtures or any interest therein or to rent or lease such property to or from others or make contracts with respect to the use thereof, or to sell, lease, exchange, transfer, assign, pledge, or otherwise dispose of or grant options for any such property in any manner as it deems to the best advantage of the authority and the public purpose thereof;

(16) To acquire, accept, or retain equitable interests, security interests, or other interests in any real property, personal property, or fixtures by loan agreement, note, mortgage, deed to secure debt, trust deed, security agreement, assignment, pledge, conveyance, contract, lien, loan agreement, or other consensual transfer in order to secure the repayment of any moneys loaned or credit extended by the authority;

(17) To appoint, select, and employ engineers, consultants, surveyors, architects, urban or city planners, fiscal agents, attorneys, and others and to fix their compensation and pay their expenses;

(18) To encourage, advertise, and promote the improvement and revitalization of the project areas and to make, contract for, or otherwise cause to be made long-range plans or proposals for the project areas in cooperation with the City of Augusta;

(19) To adopt bylaws governing the conduct of business by the authority, the election and duties of officers of the authority, and other matters which the authority determines to deal with in its bylaws; and

(20) To do all things necessary or convenient to carry out the powers conferred by this Act.

(b) The powers enumerated in each paragraph of subsection (a) of this section are cumulative of and in addition to those powers enumerated in other paragraphs of subsection (a) of this section and elsewhere in this Act, and no such power limits or restricts any other power of the authority.

Section 10. Revenue bonds generally. (a) The authority, or any authority or body which has or which may in the future succeed to the powers, duties, and liabilities vested in the authority created by this Act, shall have the power and is authorized to provide by resolution for the issuance of revenue bonds for the purpose of paying all or any part of the cost as defined in this Act of any one or more projects.

(b) Revenue bonds, notes, or other obligations issued by the authority shall be paid solely from the property, including, but not limited to, real property, fixtures, personal property, revenues, or other funds, that is pledged, mortgaged, conveyed, assigned, hypothecated, or otherwise encumbered to secure or to pay such bonds, notes, or other obligations.

(c) All revenue bonds, notes, and other obligations shall be authorized by resolution of the authority and adopted by a majority vote of the members of the authority at a regular or special meeting.

(d) Revenue bonds, notes, or other obligations shall bear such date or dates, shall mature at such time or times not more than 40 years from their respective dates, shall bear interest at such rate or rates which may be fixed or may fluctuate or otherwise change from time to time, shall be subject to redemption on such terms, and shall contain such other terms, provisions, covenants, assignments, and conditions as the resolution authorizing the issuance of such bonds, notes, or other obligations may permit or provide. The terms, provisions, covenants, assignments, and conditions contained in or provided or permitted by any resolution of the authority authorizing the issuance of such revenue bonds, notes, or other obligations shall bind the members of the authority then in office and their successors.

(e) The authority shall have power from time to time and whenever it deems it expedient to refund any bonds by the issuance of new bonds, whether or not the bonds to be refunded have matured, and may issue bonds partly to refund bonds then outstanding and partly for any other purpose permitted under this Act. The refunding bonds may be exchanged for the bonds to be refunded, with such cash adjustments as may be agreed upon, or may be sold and the proceeds applied to the purchase or redemption of the bonds to be refunded.

(f) There shall be no limitation upon the amount of revenue bonds, notes, or other obligations which the authority may issue. Any limitations with respect to interest rates or any maximum interest rate or rates found in Article 3 of Chapter 82 of Title 36 of the O.C.G.A., the "Revenue Bond Law," the usury laws of this state, or any other laws of this state shall not apply to revenue bonds, notes, or other obligations of the authority.

Section 11. Applicability of "Revenue Bond Law"; form; provisions for exchange and transfer; certificate of validation; specification of interest rates in notice to district attorney or Attorney General; "cost of the project" or "cost of any project" defined. (a) All bonds issued by

the authority under this Act shall be issued and validated under and in accordance with Article 3 of Chapter 82 of Title 36 of the O.C.G.A., the "Revenue Bond Law," except as provided in this Act, provided that notes and other obligations of the authority may, but shall not be required to, be so validated.

(b) Bonds issued by the authority may be in such form, either coupon or fully registered, or both coupon and fully registered, and may be subject to such exchangeability and transferability provisions as the bond resolution authorizing the issuance of such bonds or any indenture or trust agreement may provide.

(c) Bonds shall bear a certificate of validation. The signature of the clerk of the Superior Court of Richmond County may be made on the certificate of validation of such bonds by facsimile or by manual execution, stating the date on which such bonds were validated, and such entry shall be original evidence of the fact of judgment and shall be received as original evidence in any court in this state.

(d) In lieu of specifying the rate or rates of interest which bonds to be issued by an authority are to bear, the notice to the district attorney or the Attorney General, the notice to the public of the time, place, and date of the validation hearing, and the petition and complaint for validation may state that the bonds when issued will bear interest at a rate not exceeding a maximum per annum rate of interest, which may be fixed or may fluctuate or otherwise change from time to time, specified in such notices and petition and complaint or may state that, in the event the bonds are to bear different rates of interest for different maturity dates, none of such rates will exceed the maximum rate, which may be fixed or may fluctuate or otherwise change from time to time, so specified; provided, however, that nothing in this Act shall be construed as prohibiting or restricting the right of the authority to sell such bonds at a discount, even if in doing so the effective interest cost resulting therefrom would exceed the maximum per annum interest rate specified in such notices and in the petition and complaint.

(e) The terms "cost of the project" and "cost of any project" shall have the meaning prescribed in this Act whenever those terms are referred to in bond resolutions of the authority, in bonds, notes, or other obligations of the authority, or in notices or proceedings to validate such bonds, notes, or other obligations of the authority.

Section 12. Authorized contents of agreements and instruments of authority generally; use of proceeds; subsequent issues; bond anticipation notes. (a) Subject to the limitations and procedures provided by this section and by Section 11 of this Act, the agreements or instruments executed by the authority may contain such provisions not inconsistent with law as shall be determined by the authority.

(b) The proceeds derived from the sale of all bonds, notes, and other obligations issued by the authority shall be held and used for the ultimate purpose of paying, directly or indirectly as permitted in this Act, all or part of the cost of any project or for the purpose of refunding any bonds, notes, or other obligations issued in accordance with this Act.

(c) Issuance by the authority of one or more series of bonds, notes, or other obligations for one or more purposes shall not preclude it from issuing other bonds, notes, or other obligations in connection with the same project or with any other projects; provided, however, that the proceeding wherein any subsequent bonds, notes, or other obligations are issued shall recognize and protect any prior loan agreement, mortgage, deed to secure debt, trust deed, security agreement, or other agreement or instrument made for any prior issue of bonds, notes, or other obligations, unless in the resolution authorizing such prior issue the right is expressly reserved to the authority to issue subsequent bonds, notes, or other obligations on a parity with such prior issue.

(d) The authority shall have the power and is authorized, whenever bonds of the authority shall have been validated as provided in this Act, to issue from time to time its notes in anticipation of such bonds as validated and to renew from time to time any such notes by the issuance of new notes, whether or not the notes to be renewed have matured. The authority may issue such bond anticipation notes only to provide funds which would otherwise be provided by the issuance of the bonds as validated. Such notes may be authorized, sold, executed, and delivered in the same manner as bonds. As with its bonds, the authority may sell such notes at public sale or at private sale. Any resolution or resolutions authorizing notices of the authority or any issue thereof may contain any provisions which the authority is authorized to include in any resolution or resolutions authorizing bonds of the authority to any issue thereof; and the authority may include in any notes any terms, covenants, or conditions which the authority is authorized to include in any bonds. Validation of such bonds shall be a condition precedent to the issuance of such bonds, but it shall not be required that such notes be judicially validated. Bond anticipation notes shall not be issued in an amount exceeding the par value of the bonds in anticipation of which they are to be issued.

Section 13. Obligations of authority not public debt of state or political subdivision thereof. No bonds, notes or other obligations of and no indebtedness incurred by the authority shall constitute an indebtedness or obligation of the State of Georgia or any county, municipal corporation, or political subdivision thereof, nor shall any act of the authority in any manner, nor any contract entered into by the authority with any county, municipal corporation, or political subdivision thereof, constitute or result in the creation of an indebtedness of this state or any county, municipal corporation, or political subdivision thereof. Any county, municipal corporation, or political subdivision of this state may obligate itself to pay the payments required under such contracts from moneys received from taxes and from any other source without creating a debt within the meaning of Article IX, Section V, Paragraph I of the Constitution of the State of Georgia. No holder or holders of any such bonds, notes, or other obligations shall ever have the right to compel any exercise of the taxing power of the state or any county, municipal corporation, or political subdivision thereof, nor to enforce the payment thereof against the state or any such county, municipal corporation, or political subdivision.

Section 14. Constitutional authority for enactment of Act; tax exemption. This Act is enacted pursuant to authority granted the General Assembly by the Constitution of the State of Georgia. The authority is created for nonprofit and public purposes, and it is found, determined, and declared that the creation of the authority and the carrying out of its corporate purposes is in all respects for the benefit of the people of this state and that the authority is an institution of purely public charity and will be performing an essential governmental function in the exercise of the power conferred upon it by this Act; and for such reasons the state covenants from time to time

with the holders of the bonds, notes, and other obligations issued under this Act, that the authority shall be required to pay any taxes or assessments imposed by this state or any counties, municipal corporations, political subdivisions, or taxing districts thereof upon any property acquired by the authority or under its jurisdiction, control, possession, or supervision or leased by it to others or upon its activities in the operation or maintenance of any such property or on any income derived by the authority in the form of fees, recording fees, rentals, charges, purchase price, installments, or otherwise; and that the bonds, notes, and other obligations of the authority, their transfer, and the income therefrom shall at all times be exempt from taxation within this state. The tax exemption provided for in this Act shall not include any exemption from sales and use taxes on property purchased by the authority or for use by the authority.

Section 15. Applicability of the "Georgia Securities Act of 1973." The offer, sale, or issuance of bonds, notes or other obligations by the authority shall not be subject to regulation under Chapter 5 of Title 10 of the O.C.C.A., the "Georgia Securities Act of 1973." No notice, proceeding, or publication except those required by this Act shall be necessary to the performance of any act authorized by this Act, nor shall any such act be subject to referendum.

Section 16. Effect of Act under successor government. Any reference in this Act to the City of Augusta shall be deemed to include the City of Augusta in its present governmental form or any governmental entity which may succeed to the powers, duties, and liabilities invested in the current government. All provisions of this Act shall be effective under any such successor government, which would include, but is not limited to, a successor consolidated government of the City of Augusta and Richmond County.

Section 17. Construction. This Act and all provisions, rights, and powers granted to the authority, being for the welfare of the state and its inhabitants, shall be liberally construed for the accomplishment of its purposes.

Section 18. Powers declared supplementary. The provisions of this Act shall be regarded as supplementary and additional to powers conferred by other laws and shall not be regarded as being in derogation of any powers now existing.

Section 19. Severability. In the event any section, subsection, sentence, clause, or phase of this Act shall be declared or adjudged invalid or unconstitutional, such adjudication shall in no manner affect the other sections, subsections, sentences, clauses, or phrases of this Act, which shall remain of full force and effect as if the section, subsection, sentence, clause, or phase so declared or adjudged invalid or unconstitutional were not originally a part hereof. The General Assembly declares that it would have passed the remaining parts of this Act if it had known that such part or parts hereof would be declared or adjudged invalid or unconstitutional.

Section 20. Repealer. All laws and parts of laws in conflict with this Act are repealed.

NOTICE OF INTENTION TO
INTRODUCE LOCAL LEGISLATION

Notice is given that there will be introduced at the regular 1989 session of the General Assembly of Georgia a local legislation to create an Augusta Canal Authority; to provide for matters relating thereto; and for other purposes.

This 14th day of February, 1989.

Paul H. Dunbar, III
Attorney for City of Augusta

GEORGIA, FULTON COUNTY

Personally appeared before me, the undersigned authority, duly authorized to administer oaths, Jack Connell, who, on oath, deposes and says that he is Representative from the 87th District, and that the attached copy of Notice of Intention to Introduce Local Legislation was published in the Augusta Herald which is the official organ of Richmond County, on the following date: February 17, 1989.

/s/ JackConnell
Representative, 87th District

Sworn to and subscribed before me,
this 22nd day of February, 1989.

/s/ Mary Margaret Oliver
Notary Public,
Commission Expires July '90

Approved March 30, 1989.

Georgia Department of Natural Resources

Environmental Protection Division – Land Protection Branch

2 Martin Luther King Jr. Drive, Suite 1054, Atlanta, Georgia 30334

(404) 656-7802; Fax (404) 651-9425

Judson H. Turner, Director

January 16, 2014

Ms. Cindy Nolan
U.S. Environmental Protection Agency
Region 4
Atlanta Federal Center
61 Forsyth Street (SNFC, EPA Mail Rm)
Atlanta, GA 30303

RE: Brownfields Cleanup Grant Application – Augusta Canal Authority, Former Sibley Mill, Augusta, Georgia

Dear Ms. Nolan:

The Augusta Canal Authority (ACA) has asked the Georgia Environmental Protection Division (GA EPD) to provide a letter pursuant to the threshold eligibility criteria for funding under the U.S. Environmental Protection Agency's Small Business Liability Relief and Brownfields Revitalization Act. The ACA will be submitting an application to the U.S. Environmental Protection Agency (EPA) for funding assistance under the federal Cleanup Grant Program to remediate Area F, a portion of the textile mill, Sibley Mill, located at 1717 Goodrich Street, Augusta, Georgia.

The ACA is seeking brownfields cleanup grant funds for a portion of the former Sibley Mill known as Area F located behind the mill building, along the canal. The property is a defunct textile mill that occupies approximately 17.5 acres with a 516,000 square foot brick building dating from the 1800's. The mill was built on the bank of the historic Augusta Canal on the same property that was once housed the Confederate Gunpowder Works, the only permanent edifice constructed by the Confederate States of America. The textile mill operation shut down in 2006; however, the property still houses a functioning hydroelectric plant capable of supplying power to the property.

The ACA plans to redevelop the historic structure into a mixed-use development incorporating offices, residences, retail, and green energy generation. Prior to acquiring the mill, the ACA conducted Phase I and Phase II Environmental Site Assessments at the property. These due diligence investigations identified a number of potential environmental hazards that will need to be addressed, including the removal of former storage tanks, lead and asbestos abatement, and soil cleanup. Area F contains a 70,500 gallon fuel oil storage tank and contaminated soils. The requested cleanup grant funds will be used to conduct the necessary environmental remediation activities.

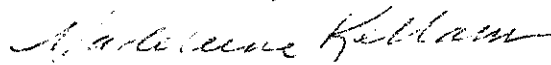
The ACA has proven their success in implementing large-scale Brownfields revitalization projects, as evidenced by their redevelopment of the former Enterprise Mill property. Enterprise Mill, located adjacent to Sibley Mill, has been successfully redeveloped by the ACA while preserving the historical brick mill structure. The former mill now a vibrant mixed-use development that generates its own energy and also houses the Augusta Canal National Heritage Area Interpretive Center, which includes interactive exhibits about the history of the Augusta Canal and the city's industrial growth. The Sibley Mill Project is expected to be just as successful.

Ms. Nolan
January 16, 2014
Page 2

Georgia EPD would like to take this opportunity to encourage EPA's positive decision in making a grant award to Augusta Canal Authority to target remediation in Area F of the former Sibley Mill. A cleanup grant award to the Augusta Canal Authority, a development agency with a proven track record for innovative and successful brownfields redevelopment, would not only assist the city of Augusta, but will likely yield a showcase project that will highlight the enormous capabilities of EPA's Brownfields Assessment, Revolving Loan, and Cleanup Grant Program.

As always, Georgia appreciates your consideration of this grant application and the leadership that the US EPA Brownfields Program provides in this vital environmental effort.

Sincerely,



Madeleine Kellam
Brownfields Coordinator

cc: Mr. Brian Gross, US EPA Region 4

File: Brownfields ARC Grants – FFY 2014

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AFFIDAVIT OF PUBLICATION

ATTORNEY
OR AGENCY: AUGUSTA CANAL AUTHORITY
P.O. BOX 2367
AUGUSTA, GA 30903

ACCOUNT NUMBER: 1000163577
AD NUMBER: 1001666742
PO NUMBER:

STATE OF GEORGIA
COUNTY OF RICHMOND

Personally appeared before me, **Nathan Edwards**, to me known, who being sworn, deposes and says:
That he is the authorized agent of Southeastern Newspapers Company, LLC, a Georgia Limited Liability Company, doing business in said County under the trade name of **The Augusta Chronicle**, a newspaper in said County; That he is authorized to make affidavits of publication on behalf of said publisher company: **The Augusta Chronicle**; that said newspaper is of general circulation in said county and in the area adjacent thereto; that he has reviewed the regular editions of said newspapers published on:

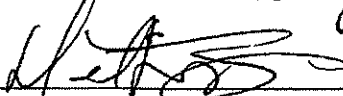
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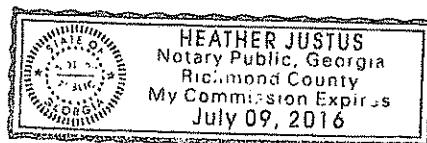
and finds that the following advertisement appeared in each of said editions, to-wit:

 (deponent)

Sworn to and subscribed before me

This 9th day of January, 2014


Notary Public Richmond County, Georgia.



Augusta Canal Authority, Augusta, Georgia – Sibley Mill Brownfields Cleanup Project
Public Notice: Submission of EPA Brownfields Cleanup Grant Application and
Analysis of Brownfields Cleanup Alternatives (ABCA)

The Augusta Canal Authority is submitting a Brownfields Cleanup Grant Application to the United States Environmental Protection Agency (EPA) to conduct cleanup activities at Sibley Mill at 1717 Goodrich Street, Augusta, Georgia. The property is identified by Tax Map 027-4-096-00-1. Brownfields are identified as real property where the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. The grant amount requested is \$200,000 with the Canal Authority making a match of \$40,000. If funded, the grant will be used for cleanup work as well as community outreach. The cleanup work will be performed in accordance with one of the alternatives outlined in the Analysis of Brownfields Cleanup Alternatives (ABCA). The purpose of the ABCA is to evaluate various cleanup/management alternatives for existing debris and contaminated surface and sub-surface soils.

This notice is to inform the community of the preparation of the grant application and the draft ABCA. The ABCA and cleanup grant will be available for public comment at a community meeting on December 17, 2013. A draft copy of the ABCA and cleanup grant will be available at the Canal Authority office located at 1450 Greene Street, Suite 400, Augusta, Georgia, 30901 and on the Canal Authority's website at www.augustacanal.com beginning on December 18, 2013 until January 17, 2014, before the grant is submitted on January 22, 2014.

Community input is an integral and meaningful part of this type of project, and public and community-based organizations are encouraged to review the draft grant application and ABCA and provide comments. This matter will be discussed in a public meeting on Tuesday, December 17, 2013, at 6:00 p.m. at Enterprise Mill, 1450 Greene Street, (Cotton Room), Augusta, GA. Interested citizens are invited to attend the meeting. Interested community-based organizations are also encouraged to contact Dayton Sherrouse or Gail Rawls Jeter to provide comments and/or show support. Please send any comments to

Dayton Sherrouse
Executive Director
Augusta Canal Authority
1450 Greene Street, Suite 400
Augusta, Georgia, 30901
sherrouse@augustacanal.com
(706) 823-0440 extension 1 – Phone
(706) 823-1045 – Fax

OR

Gail Rawls Jeter
Cardno, Inc
1233 Washington Street, Suite 1000
Columbia, South Carolina 29201
Gail.Jeter@Cardno.com
(803) 929-6059 – Phone
(803) 765-8312 – Fax

**ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES (ABCA)
US EPA BROWNFIELD CLEANUP GRANT PROGRAM**

**Northern Parcel - Sibley Mill
1717 Goodrich Street
Augusta, Georgia**

Introduction and Background

The subject site is located at 1717 Goodrich Street in Augusta, Georgia, and is one parcel of a larger complex, consisting of a former industrial textile manufacturing site with several buildings totaling approximately 518,000 square feet. A Confederate powder works was located on this site prior to the textile mill being constructed. The site is 21.1 acres of land located between the Savannah River and the Augusta Canal. The site is divided into several tracts with the subject tract "A-2" measuring approximately 6.3 acres.

The Sibley Mill was constructed on the canal in 1881 and operated continuously until it closed in 2006. It is one of only four remaining textile structures remaining on the canal. Two of these have been successfully redeveloped as LEED certified buildings consisting of mixed use office, retail and residential. One is still being used as an active textile operation. The Sibley Mill is the most historically significant of the Augusta Mills from an architectural standpoint, and it has remained vacant and underutilized since it closed in 2006. Sibley and two of the other sites still receive their electrical power from on site hydro-electric generating station powered by water from the Augusta Canal, making this site a true energy efficient facility.

The main obstacle to redevelopment of the Sibley Mill is the existence of hazardous substances on the site and in the remaining buildings. The Authority purchased the site on August 31, 2010, following the "All Appropriate Inquiry" process. This ABCA, once implemented, will allow the Augusta Canal Authority to continue the environmental cleanup that will ultimately lead to the redevelopment of the site.

Once the site is cleaned up, the site will be redeveloped and returned to productive use. The planned reuse for the site includes residential, green energy generation, job incubation and office space. Redevelopment costs are estimated to exceed \$30 million dollars generating a 30 percent increase in local tax revenue, generating 175 jobs during construction and 20 permanent jobs after construction. Additionally one of the City's most historic resources will be preserved.

A Brownfield Corrective Action Plan (CAP) was prepared in June 2010 for the site. This ABCA incorporates and expands upon the elements of this plan which has been reviewed and approved by the Georgia Environmental Protection Division (EPD).

Contamination Issues

Augusta Capital signed an option in May 2007 to purchase the site and subsequently completed the following environmental assessment/activities prior to cancelling the option in October 2008. During that time, the following assessments were completed:

- Phase I Environmental Site Assessment prepared by Advanced Environmental Options, Inc., Spartanburg, SC, June 2007.
- Phase II Environmental Site Assessment prepared by Advanced Environmental Options, Inc., Spartanburg, SC, October 2007.
- Soil Sampling Report, Alternative Construction and Environmental Solutions, Inc., Augusta, GA, August 2007.
- Review and Update of prior environmental assessments, Alternative Construction and Environmental Solutions, Inc., Augusta, GA, January 2008.
- UST Closure Report by Advanced Environmental Options, Inc., Spartanburg, SC, April 2008 for removal of a 3,000-gallon underground storage tank holding #6 fuel oil for backup heat.

The Augusta Canal Authority commissioned updates of the Phase I & Phase II Environmental Assessments to evaluate the potential for environmental liabilities on the subject site prior to the purchase of the property. American Environmental & Construction Services prepared the reports dated May 20, 2010. These reports were conducted to meet the requirements of All Appropriate Inquiry (AAI) by the Authority prior to purchase. Potential environmental concerns identified on and in proximity to the subject site included:

- Caustic Tank &/lines.
- Dye Tank & lines.
- #6 Fuel Oil Tank.
- PCBs.
- Pesticides and Herbicides.
- Soil contamination consisting of lead, mercury, cadmium, arsenic, and petroleum constituents.
- Lead paint.
- Asbestos.

Soil samples were collected from 83 locations and were analyzed for a variety of constituents, primarily volatile organic compounds (VOCs), Semi-volatile organic compounds (SVOCs), metals, pesticides and PCBs. The Phase II environmental assessment confirmed the existence of soil contamination including:

- Metals: arsenic, barium, cadmium, chromium, lead, and mercury
- Semi-Volatile Organic Compounds: Benzo{a} anthracene, Benzo {a} pyrene, Benzo {b} fluoranthene, Benzo {k} flouranthene, Chrysene, Dibenz {a} anthracene, Indeno {1, 2, 3-cd} pyrene, Phenanthrene, Acetophenone
- Volatile Organic Compounds: tetrachloroethene, trichlorethene, benzene, carbon disulfide
- Lead-based paint, asbestos and PCBs were found within some of the buildings above Type I Risk Reduction Standards at various locations on the site.

Most of these compounds have been attributed to the former textile operations with the exception of lead in the soil which can most probably be attributed to the use of the site as the Confederate States Powder Works operation during the Civil War.

Seven borings were converted to groundwater monitoring wells. Groundwater samples from each well have been tested for petroleum constituents associated with the on-site UST which was removed by the prior owner. These tests found VOCs in four locations and RCRA metals in two locations. These locations will be retested throughout the remediation process and it is anticipated that once the soil remediation is complete the groundwater samples will be clean.

Based on the findings of these assessments, a Prospective Purchaser Corrective Action Plan (PPCAP) and an application for approval as a Brownfield site, dated June 2010, was submitted to the Georgia Environmental Protection Division (GAEPD) for approval under the Georgia Hazardous Site Reuse and Redevelopment Act. On August 26, 2010, The GAEPD approved the PPCAP and confirmed that the site met the Brownfields qualifying criteria established under the Act (Attachment B).

Applicable Laws

The applicable law that relates to the cleanup of the site is Section 12-8-200 of the Hazardous Site Reuse and Redevelopment Act (HSRRA) under the authority of the Georgia Department of Natural Resources, Environmental Protection Division Hazardous Waste Management Branch, also known as the Georgia Brownfield Program.

Augusta Canal Authority (ACA), as grantee, has cleanup oversight responsibility. Specific day to day responsibility will be assigned to the Executive Director, Dayton L.

Sherrouse, AICP who has over forty years of experience with administering state and federal grants. A consultant, who is a licensed environmental professional in the State of Georgia, will be contracted by ACA to perform the cleanup activities for ABI. The Georgia Environmental Protection Division (EPD) is the State agency that has reviewed and approved the CAP and will review and approve the Compliance Status Report (CSR) documenting that the CAP was implemented as required by the State and the HSRRA.

Under the HSRRA, ACA will be responsible to remediate soil and source conditions. Remediation of pre-existing groundwater conditions is not required.

Cleanup Standards

As described in the approved CAP, areas which exceed the applicable Soil Risk Reduction Standards ("SRRS") will be subject to further corrective action in order to bring the site into compliance with the approved CAP. Additional confirmation/verification soil sampling to further define the vertical and/or horizontal limits of impacted soil on the property may also be required.

Since the future use of the Sibley Mill will include a mix of end uses, including residential, the applicant plan to comply with residential SRRS (Type 1 or 2).

Analysis of Brownfield Cleanup Alternatives Considered

Under the approved Brownfield CAP for Area F, ACA is required to remove source material, and remediate soil to applicable SRRS. Alternatives for cleanup include the following four basic options (and combination thereof) for identified impacted soil areas:

1. In-place treatment,
2. excavation, transport and proper disposal of soils off-site,
3. implementation of institutional and/or engineering controls,
4. combination of 2 & 3, or
5. No action.

The corrective action scope of work will include a combination of confirmation/verification soil and groundwater sampling and analysis and soil remediation. The intent of the work is to remove soil that exceeds the selected soil risk reduction standards (SRRS) for constituents of concern (COCs) in order to eliminate the potential soil exposure pathway in

relation to end users of the Sibley Mill site. Potential categories of analytes include VOCs, SVOCs, Metals, Pesticides and PCBs.

The Report of Environmental Investigation Activities and the approved CAP indicate the potential for numerous localized areas of soil that will exceed SRRS, possibly comprised of various COCs. As such, in Option 1, the development of an in-place treatment methodology tailored to each specific area and constituent that is above the SRRS is anticipated to be a more costly process, which would adversely affect the remediation schedule and is, therefore, generally considered impracticable in comparison to excavation, transport and proper off-site disposal.

Option 5 is not considered practical due to the presence of constituents above residential risk reduction standards and the intended redevelopment and reuse of the site for residential purposes.

Based on the available data, the site setting and the future use of the site, Option 2 excavation/off-site disposal is generally considered most practical to achieve SRRS compliance. Option 3, to implement engineering controls is considered feasible; however, the concurrence of the GA EPD would be required.

Effectiveness and Implementability of Proposed Cleanup

The scope of work described herein was outlined in the Report of Environmental Investigation Activities and is intended to meet the requirements outlined in the GA EPD approved CAP.

Soils that are identified as exceeding the selected SRRS will be excavated to the limits determined through delineation/confirmation sampling in accordance with the Report of Environmental Investigation Activities and the approved CAP. Excavated material that requires off-site disposal will be placed directly into a roll-off box or stockpiled with appropriate cover and erosion control. The adequate treatment, removal or control of impacted soil areas will be confirmed through confirmation/verification sampling in order to demonstrate compliance. The material will be sampled and profiled prior to proper transport and off-site disposal.

The intent of the remediation of soil that exceeds the SRRS for any COC is to eliminate the exposure risk for the site end users after redevelopment. Potential categories of analytes include VOCs, SVOCs, Metals, Pesticides and PCBs.

Under Option 2, approximately 11,000 cubic yards of material will require excavation in order to remove the contaminated soils from Area F. The estimated cost for soil excavation, loading, transport and disposal estimate is \$110/cubic yard, including a contingency of 20%.

Based on the estimated quantity of soil remediation in these areas at 11,000 cubic yards, the estimated total cost for this work is \$1,210,000.

Under Option 3, an engineered cap will be placed over an approximately 1.25-acre area. The estimated cost for site preparation, transport, placement, and compaction of clean material for the cap is estimated at \$50,000/acre, including a contingency of 20%. Based on the estimated area of contamination in Area F of 1.25 acres, the estimated total cost for this work is \$62,500.

Under Option 2, approximately 1,100 cubic yards of material will require excavation in order to remove the contaminated soils from the areas within Area F with the highest impacts. The estimated cost for soil excavation, loading, transport and disposal estimate is \$110/cubic yard, including a contingency of 20%. In addition, an engineered cap will be placed over an approximately 1.2-acre area. The estimated cost for site preparation, transport, placement, and compaction of clean material for the cap is estimated at \$50,000/acre, including a contingency of 20%. Based on the estimated quantities, the estimated total cost for this work is \$181,000.

Estimated Cost and Schedule for Proposed Cleanup Alternatives

The table below summarizes the task, estimated budget, schedule and deliverables for these proposed cleanup alternatives.

Number	Brownfield Cleanup Alternative	Estimated Budget	Estimated Schedule	Deliverable
1.	In-place Treatment	\$400,000	120 days	Compliance Status Report
2.	Excavation, Transport and Off-site Disposal (11,000 cubic yards of soil)	\$1,285,000	90 days	Compliance Status Report
3.	Implementation of Engineering Control	\$137,500	180 days	Compliance Status Report
4.	Combination of 2 & 3	\$181,000	180 days	Compliance Status Report
5.	No Action	\$0.00	0 days	N/A

These opinions of cost to address soils impacted above applicable SRRS (i.e. soil remediation) have been estimated based on the information that is available at this time. The costs associated with confirmation/verification sampling, monitoring, and documentation of the

remedial work is beyond the costs associated with the soil remediation work and/or the implementation engineering controls.

Reasonableness of Various Cleanup Alternatives Considered

Based on our experience, the various cleanup alternatives in this ABCA are considered reasonable and are consistent with and based on industry standards and practices for cleanup alternatives for these types of environmental conditions and these types of projects.

Selected Proposed Cleanup Approach

The primary selected proposed cleanup approach is Option 4, the combination of excavation, transport, and off-site disposal and the implementation of an engineered cap in Area F. This method was selected based on its effectiveness, implementability and cost considering the anticipated limited extent of soil impacts, potentially at multiple locations within the boundaries of the site. Using a combination of the alternatives will allow the end-user to balance the maximum effectiveness within a reasonable budget. Additional institutional and/or engineering controls may be utilized to protect the public safety, if necessary.

Ability of Grantee to Implement the Proposed Alternatives

The Augusta Canal Authority is a special purpose government entity created by an act of the Georgia General Assembly in 1989. Similar to a development authority, the Augusta Canal Authority can enter into contracts and issue bonds. In 1999 the Legislature expanded the Authority from 5 to 12 members. Each Augusta Commissioner appoints one member; the Richmond County legislative delegation appoints the rest. In 1993 the Authority adopted a Master Plan that has guided the development and preservation of the Canal as a natural, historic and economic resource. Today, the Authority's mission is to execute the master plan. The Authority does not own the Canal, however, the Augusta Canal Authority is designated by Congress as the Management Entity for the Augusta Canal National Heritage Area. The Canal is public property owned the City of Augusta and the Authority operates under a Memorandum of Understanding with the City of Augusta (www.augustacanal.com)

As owner of the Sibley Mill, the Augusta Canal Authority has experience with administering and overseeing the overall planning, design and construction and redevelopment of the site of which the environmental remediation is a part. ACA is currently conducting environmental remediation on portions of the site.

Augusta Canal Authority, the grantee, has experience with administering grants. The oversight of the cleanup will be provided in-house by the Augusta Canal Authority. Specific day to day responsibility will be assigned to the Executive Director, Dayton L. Sherrouse, AICP who has over forty years of experience with administering state and federal grants.

Augusta Canal Authority Brownfields Cleanup Grant Application for Sibley Mill Area F
Public Meeting December 17, 2013

Name

Address

Telephone Number

Email Address

Julie Boone	2301 Dearborn St Augusta, GA 30904	813-679-6937	juboos86@hotmail.com
Margaret Harrison	2225 Edgewood Dr Augusta GA 30904	706 825 1094	margaretharrison 42@yahoo.com
Deleca Rogers	3353 Sugar Mill Rd Augusta GA 30907	706-860-5162	canalady@gmail.com
Michael Harrison	3008 Pine Needle Rd Augusta GA 30909	706 284 4444	jmichaelharrison@ gmail.com
Phillip Williams			
Paul DeCamp	525 Telfair St. Augusta, GA 30901	706 821-1796	pdecamp@augustaga.gov

Augusta Canal Authority Brownfields Cleanup Grant Application for Sibley Mill Area F

Public Meeting December 17, 2013

Name	Address	Telephone	Email Address
BOB WOODHURST	607 15TH STREET AUGUSTA GA 30904	706-724-4343	bob@woodhurstarchitects.com
ANNE CATHERINE MURRAY	720 ST. SEBASTIAN WAY STE 100 AUGUSTA 30901	706-262-4004	acm@flywheelprojects.com
David Lee	1916 North Leg Rd Augusta, GA 30909	706-667-4390	djlee@dhr.state.ga.us
Richard G. Zell	439 Swifts Way Augusta, GA 30909	706-738-1912	xiler98@bellsouth.net
Ann Zell	3042 Pine Needle Rd Augusta Ga 30909	706 783 0602	TRALLEWLAN@aol.com
Melanie Wilson	625 Telfair St Augusta 30901	706 821-1796	mwilson@augustaga.gov
Tom Robertson	947 Meigs Street Augusta, Georgia 30904	706-738-6469	THRobertson@cranstonengineering.com

Notes
Augusta Canal Authority Cleanup Grant Application
Public Meeting for Sibley Mill
December 17, 2013
6:00 PM

The project team presented the following information to community members attending the public meeting for the EPA Brownfields Cleanup Application for the Northern Parcel of Sibley Mill:

- Definition of brownfields;
- History of Sibley Mill and how contamination occurred;
- Due diligence that Augusta Canal Authority (ACA) conducted prior to taking title to the property, including entering into the Georgia Brownfields Program;
- Planned objectives of the current cleanup grant;
- The target area (Area F of the Northern Parcel) and contaminant levels to be addressed in this cleanup; and
- Options for cleanup of Area F as detailed in the ABCA.

The floor was then opened for question and discussion. The following summarizes the topics discussed:

- Appropriate cleanup method with consideration being given to redevelopment and costs.
- While some redevelopment options are available, no one knows for certain what a developer will want.
- A complete cleanup to residential standards is obviously the best, but it is likely to cost more than \$1,000,000.
- A capping of the area would cost less than \$100,000. The Harrisburg Neighborhood Association President, Phillip Williams, asked what a cap was. The project team explained that it could be a soil cover, concrete cover, asphalt cover, etc. that prevents human contact with contaminants.
- Without a specific redevelopment plan showing parking areas, ACA would not know if they should asphalt part of the contaminated area.
- It was explained that the negatives of a cap are that it will have to be maintained and that it is unlikely that single family residential could occur on a capped site. Everyone agreed that this site is not likely to ever be redeveloped as single family residential, especially with the Historic Register requirement of maintaining the Sibley Mill structures.

The consensus from the discussion is that ACA should consider removal of the worst contamination and capping of the other portions. In response, the ABCA was revised on December 20, 2013, to present the option of a combination of excavation and off-site disposal of contaminated soils on a portion of Area F with the installation of an engineered cap on the remaining portion of Area F.



Brenda Fitzgerald, MD, Commissioner | Nathan Deal, Governor

1916 North Leg Road
Augusta, Georgia 30909-4437
Phone: 706-667-4326
Fax: 706-667-4365

www.ecphd.com

January 22, 2014

Mr. Dayton L. Sherrouse, AICP
Executive Director
Augusta Canal Authority
1450 Greene Street, Suite 400
Augusta, Georgia 30901

Dear Mr. Sherrouse:

The East Central Health District (ECHD) strongly supports the Augusta Canal Authority's application being submitted to the U.S. Environmental Protection Agency addressing environmental issues at the Sibley Mill property and advancing work initiated in 2013. Projects such as this are vital to building healthy communities. These efforts will assist us in improve physical health of area residents.

The ECHD commends the Augusta Canal Authority's ongoing efforts to remove environmental contaminants found at the Sibley Mill property. We appreciate the opportunity of being able to participate in the Brownfield's Task Force. We look forward to collaborating with your organization as you move forward with this important project.

Sincerely,

A handwritten signature in black ink that reads 'Ketty M. Gonzalez, MD'.

Ketty M. Gonzalez, MD MS
District Health Director

East Central Health District

Ketty M. Gonzalez, MD, MS, District Health Director



We Protect Lives.

January 20, 2014

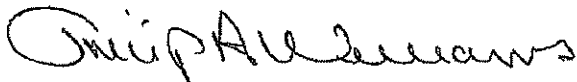
Dayton L. Sherrouse, AICP
Executive Director
Augusta Canal National Heritage Area
P. O. Box 2367
Augusta, GA 30903

Dear Mr. Sherrouse,

As president of the Harrisburg -- West End Neighborhood Association I would like to take this opportunity to provide you with some input from our local community. We are most pleased to hear of your continued efforts to remediate the building and grounds that constitute the Sibley Mill. We collectively believe, very strongly, that the continued redevelopment of the mill will bring a substantial benefit to the surrounding area and contribute significantly to the revitalization of urban Augusta. We look forward to the progress that this project will to our neighborhood. Our association is aware of the Task Force which is being formed to provide continued community input and oversight to these efforts and we welcome the opportunity to assist in this process. We stand ready to assist in any way possible in this important work.

Thank you for your kind consideration in these matters.

Sincerely,

A handwritten signature in black ink, appearing to read "Phillip A Williams". The signature is fluid and cursive, with the first name "Phillip" being more prominent and the last name "Williams" following in a similar style.

Phillip A Williams

President, Harrisburg West End Neighborhood Association
1628 Broad Street
Augusta, GA 30904



DOING THE MOST GOOD™

William Booth, *Founder*
André Cox, *General*
Commissioner Donald C. Bell, *Territorial Commander*
Major Jim Arrowood, *Divisional Commander*
Major Tony Perez, *Area Commander*
Major Vicki Perez, *Associate Area Commander & Senior Kroc Officer*

Augusta Area Command

ADVISORY BOARD

Ben Watts
Chairperson

Ashley Wright
Vice-Chairperson

Bennett Bowers
Finance

Keith Hedgspeth
Secretary

January 16, 2014

Dayton L. Sherrouse, AICP
Executive Director Augusta Canal Authority
1450 Greene Street Suite 400
Augusta, GA 30901

Dear Dayton:

LIFE MEMBERS

Bob Richards
Norm Schaffer
Ed Zeigler

ADVISORY BOARD MEMBERS

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Tom Blanchard
Carson Brown
Ray Brown
Ann Boardman
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Julian Roberts
Kerri Thompson
Randall W. Tucker, Sr.
John Vcal
Brad Usry
Jay Weigle
Phillip A. Williams
Bob Wright
Andrew Wyatt

I am writing this letter to you on behalf of the Augusta Canal Authority's application for an EPA grant to support the environmental remediation of the former Sibley Mill. I ask that you please convey the importance of the restoration the Sibley Mill has not only to the Harrisburg community and the historic Augusta Canal, but to its immediate and newest neighbor: The Salvation Army Kroc Corps Community Center. The Augusta Canal Authority's work to preserve the Sibley and bring it back for adaptive reuse compliments our efforts at neighborhood revitalization.

As has been the case throughout the nation, Kroc Center locations have provided the stimulus for change in their immediate neighborhoods. The Augusta Kroc Center's seventeen acre campus combined with its \$ 90 million investment into building and endowing an arts, education and recreational campus next to the Sibley Mill site provides a great incentive for success of a project in this location. The restoration of the Sibley Mill is an essential step towards the revitalization of the Harrisburg neighborhood. We strongly believe this effort compliments the approximate \$90 million investment the Kroc Center has brought to the neighborhood.

We believe that the Augusta Canal Authority, with its strong board and history of running successful projects, is the organization that will get this project done. I will be pleased to support your application in any way possible and look forward to speaking to anyone about this in the future. Thank you for all you do for the Augusta Canal, historic preservation and the city of Augusta.

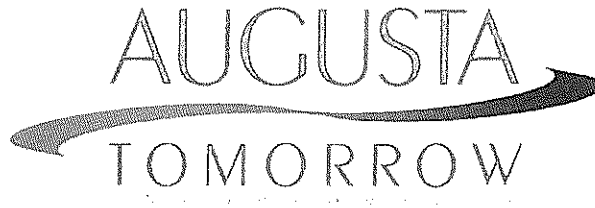
In His service

Tony Perez, Captain
Area Commander

1833 Broad Street, Augusta, GA 30904, P.O. Box 921, Augusta, GA 30903 ph: 706-364-5762 fx: 706-922-8367

...there is no reward equal to that of doing the most good to the most people in the most need." Evangeline Booth





1450 GREENE STREET
SUITE 85
AUGUSTA, GEORGIA 30901-5226

TEL: 706.722.9100
FAX: 706.722.9102
www.augustatomorrow.org

November 16, 2014

Mr. Dayton Sherrouse
Executive Director
Augusta Canal Authority
PO Box 2367
Augusta, GA 30903-2367

RE: Sibley Mill Brownfields Site Grant

Dear Mr. Sherrouse:

Augusta Tomorrow, Inc. is a privately supported organization committed to the revitalization of Augusta, the Central Savannah River Area's hub. Since 1982, Augusta Tomorrow has worked diligently toward this goal fostering partnerships with the City of Augusta, the City of North Augusta and a number of local businesses to promote economic development and revitalization for our city. Most recently we have been working with the city and different groups to foster redevelopment in economically disadvantaged areas of Augusta's downtown including Harrisburg.

Augusta Tomorrow, Inc. is committed to implementing a new Master Plan that was unveiled in March 2009. The Harrisburg Implementation Team is working steadily toward bringing about revitalization in Harrisburg. Rehabbing homes for new home ownership, supporting the development of the Augusta Kroc Center and working with city traffic engineers to develop plans for better roadways in Harrisburg are just some of the current efforts.

Augusta Tomorrow supported financially and directly the development of a Harrisburg Blueprints Project *Reclaiming Historic Harrisburg, Augusta, Georgia*. The project was underwritten by many Augusta organizations and was co-developed by the Georgia Conservancy and Georgia Institute of Technology. This yearlong initiative sent graduate students to all parts of Harrisburg to develop workable plans for the community to further develop this old mill village. The report highlighted Sibley Mill as a huge part of the Harrisburg identity, and renovating this historic structure would provide an immense boost to development of the remainder of this community neighborhood to which it is so connected.

Harrisburg is a major gateway into downtown Augusta and has several important historic structures that need to be renovated including Sibley Mill. Sibley Mill is located directly on the Augusta Canal. Although originally a textile mill, it remains one of only two remaining hydroelectric powered mills on the Augusta Canal. Unfortunately, having been a textile mill and used for the production of gunpowder during the Civil War, the site is extremely contaminated.

Although a Brownfields Grant was approved for the initial cleanup of Sibley Mill, further cleanup is required. We ask your support to request continuation of current efforts with the next phase of cleanup for Sibley Mill. This will complement the major economic development efforts currently underway in historic Harrisburg. Augusta Tomorrow, Inc. encourages the submission of the next Brownfields grant proposal. If I can supply any further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Camille A. Price".

Camille A. Price
Executive Director
Augusta Tomorrow, Inc.

The Biltmore
817 West Peachtree Street
Suite 200
Atlanta, GA 30308
tel 404.876.2900
fax 404.872.9229
mail@gaconservancy.org
georgiaconservancy.org



January 17, 2014

Dayton Sherrouse, AICP
Augusta Canal Authority
1450 Greene Street
Suite 400
Augusta, GA 30903-2367

Dear Mr. Sherrouse,

PRESIDENT
Pierre Howard

CHAIRMAN
George N. Mori, Atlanta*

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*Executive Committee Member

The Georgia Conservancy is Georgia's oldest conservation nonprofit and has been protecting Georgia's land and water since 1967. During this 45 year history, we have worked with 26 Georgia communities through our *Blueprints for Successful Communities* (*Blueprints*) program to foster sustainable community design.

We were pleased to partner with the Augusta Canal Authority during our 2011 *Blueprints* planning process for the historic Harrisburg community. Our "Reclaiming Historic Harrisburg" community master plan fully compliments the Canal Authority's goals from its own master plans. The Canal is a treasure for all of Augusta, but Harrisburg's direct geographical relationship to the Canal and the Heritage Area make these two areas inextricably linked.

We believe the success of the Heritage Area and the redevelopment success of Harrisburg are clearly dependent on one another. Therefore, we are thrilled to learn that the Canal Authority is moving forward with planning and remediation efforts necessary to redevelop the Sibley Mill site. We are fully supportive of these efforts and want to offer continued assistance. Our Blueprints program has the capacity and expertise to contribute technical assistance in planning for redevelopment on the Mill site, to participate on an advisory committee or task force, and to assist the Authority in communicating redevelopment plans to the larger Augusta community and stakeholders.

It is my understanding is that the Canal Authority is pursuing funds from the Environmental Protection Agency to aid in site remediation and the Georgia Conservancy believes this would be a significantly important and appropriate expenditure of the EPA's funds. The site's proximity to the Savannah River, one of our state's great natural resources, and the site's potential impact to the public health of Harrisburg and future site users, make a request for EPA remediation funds more than urgent and suitable for the EPA's goals.

We would appreciate the EPA's support of the Canal Authority application.

Sincerely,

Katherine Moore, AICP
Program Manager
Blueprints for Successful Communities



January 16, 2014

Mr. Dayton L. Sherrouse
Executive Director
Augusta Canal National Heritage Area
P.O. Box 2367
Augusta, GA 30903

Dear Dayton:

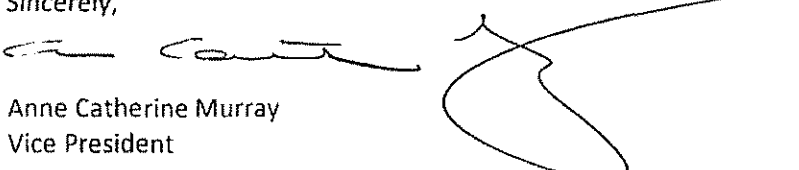
Once again, Flywheel is proud to support the Augusta Canal Authority's efforts to seek funding for the continued environmental remediation of Sibley Mill. Having rehabilitated several historic buildings, Flywheel understands the critical need to complete remediation in order to move on to saving the relevant structures.

We are responsible for the award-winning transformation of Enterprise Mill, home to the Augusta Canal's Visitor Center and Museum. In addition, we achieved LEED Gold certification in our rehabilitation of Sutherland Mill, just down from Enterprise. Sibley Mill is the most architecturally and historically significant mill in the area, and we at Flywheel believe its preservation is an absolute priority.

In 2007, our company had an option to purchase Sibley Mill, during which time we spent almost two years developing a mixed-use rehabilitation plan while negotiating purchase price with the owner. Unfortunately, because we were neither able to determine the scope of contamination nor negotiate the price to our satisfaction, coupled with the economic downturn, we made the painful choice to let our option expire. During the option period, our company spent tens of thousands of dollars in surveying, design development, and consulting, and \$2,300 in environmental assessment – such was our commitment to saving Sibley Mill. Later, when the Canal Authority was in a position to purchase Sibley, we could not have been more pleased to share with them our surveys, rehabilitation plans, and environmental assessment results. This pooling of resources reduced the amount of money and effort the Canal Authority would otherwise have had to spend to determine the extent of contamination and plan for future rehabilitation.

Flywheel remains committed to the preservation of Sibley Mill and hopes to work with the Canal Authority in the future to pursue the redevelopment of this critical historic property. We know that more remediation is essential to the success of those plans. We applaud the Canal Authority on its stewardship of Sibley and sincerely hope it will be awarded the necessary funding to continue the environmental remediation.

Sincerely,


Anne Catherine Murray
Vice President

cc: Clayton P. Boardman III, President

cc: Anne Catherine Murray

7062624004

Sutherland Mill
720 St Sebastian Way / Suite 100
Augusta Georgia 30901



Office of Anthony Wagner
EVP for Administration
and Finance, Chief
Business Officer

1120 15th Street, AA-312
Augusta, Georgia 30912
t. (706) 721-2901
f. (706) 721-2303

www.gru.edu

January 15, 2014

Mr. Dayton L. Sherrouse, AICP
Executive Director
Augusta Canal Authority
P. O. Box 2367
Augusta, GA 30903

REF: EPA Grant Proposal

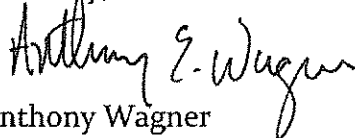
Dear Mr. Sherrouse:

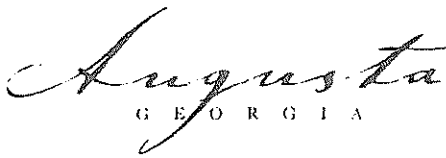
I am pleased to lend my support of your effort to obtain a \$200,000 cleanup grant from the U. S. Environmental Protection Agency to continue the environmental remediation at Sibley Mill. This property is one of Augusta's most significant historic properties and the environmental remediation is the first step in the ultimate redevelopment of the site.

We are in the process of conducting a campus Master Plan for Georgia Regents University and one of the options we are exploring is whether Sibley Mill could satisfy some of our future space needs. If so, the proposed remediation would be essential for the reuse of this property.

Feel free to contact me if I can be of any assistance to you in this regard.

Sincerely,


Anthony Wagner



January 15, 2014

Dayton Sherrouse, Executive Director
Augusta Canal Authority
1450 Greene Street, Suite 400
Augusta, GA 30901

Dear Mr. Sherrouse,

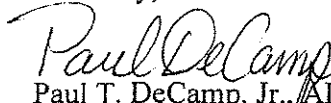
The Augusta Planning and Development Department is pleased to support the Augusta Canal Authority's Brownfields grant application being submitted to the U. S. Environmental Protection Agency. The purpose of the project is to remediate contamination on the site of the former Sibley Mill in Augusta.

The planned cleanup and adaptive reuse of the mill property supports the Cultural Resources goal of the Augusta-Richmond County Comprehensive Plan to "preserve historic resources and make them an integral part of tourism, economic development, neighborhood revitalization and heritage education." It also supports land use policies that encourage the redevelopment of older neighborhoods and encourage infill and mixed-use development.

The project is also an integral part of a larger initiative to redevelop the historic Harrisburg neighborhood, an initiative actively supported by the Georgia Chapter of the American Planning Association. As District 6 Director for the Georgia Chapter of APA I am pleased to offer ongoing technical assistance to this initiative and commit to serve on the task force for the Sibley Mill cleanup project.

We greatly appreciate the work of the Augusta Canal Authority, having the opportunity to support the grant application and to participate on the project task force. Do not hesitate to contact us if we can be of further assistance.

Sincerely,


Paul T. DeCamp, Jr., AICP
Deputy Director

PTD/s

Other Factors Checklist

Name of Applicant: Augusta Canal Authority, Augusta, GA – Sibley Mill Cleanup

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
Community population is 10,000 or less	
Federally recognized Indian tribe	
United States territory	
Applicant will assist a Tribe or territory	
Targeted brownfield sites are impacted by mine-scarred land	
Targeted brownfield sites are contaminated with controlled substances	
Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress	
Project is primarily focusing on Phase II assessments.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation	
Community experienced manufacturing plant closure(s) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant closures due to bankruptcy or economic disruptions.	
Recent (2008 or later) significant economic disruption (unrelated to a natural disaster or manufacturing/auto plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	
Applicant is a recipient or a core partner of a HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant that is directly tied to the project area, and can demonstrate that funding from a PSC grant has or will benefit the project area. To be considered, <u>applicant must attach documentation</u> which demonstrates this connection to a HUD-DOT-EPA PSC grant.	
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant	
Community is implementing green remediation plans.	
Climate Change (also add to "V.D Other Factors")	